

**Toyota Motor Engineering &
Manufacturing North America, Inc.**

Vehicle Safety & Compliance
Liaison Office
Mail Code: S-104
19001 South Western Avenue
Torrance, CA 90501

March 26, 2014

Mr. Jeffrey L. Quandt, Chief
Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE (W48-312)
Washington, DC 20590

Re: NVS-213krh; PE14-001

Dear Mr. Quandt:

On behalf of Toyota Motor Corporation, enclosed are partial responses to your January 28, 2014 Information Request (IR) regarding PE14-001. Thank you for extending the time to provide responses to requests 9, 11, and 13 to April 16, 2014.

Please be advised that some of the responses and several of the attachments provided with this response contain confidential and proprietary business information. Therefore, Toyota is submitting a request to NHTSA's Office of Chief Counsel for a determination that those materials are entitled to confidential treatment pursuant to 49 CFR Part 512 and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4).

Should you have any questions about this response, please contact me directly.

Sincerely,



Abbas Saadat
Vice President
Toyota Motor Engineering & Manufacturing
North America, Inc.

1. State, by model, engine and model year, the number of MY 2007 through 2008 Toyota Camry HEV Toyota has manufactured for sale or lease in the United States and federalized territories. Separately, for each subject vehicle manufactured to date by Toyota, state the following:
 - a. Vehicle identification number (VIN);
 - b. Model;
 - c. Engine (displacement and engine code);
 - d. Electric motor part number and rated battery pack energy;
 - e. Model Year;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. The State in the United States, or the federalized territory, where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2003, 2007, or a compatible format, entitled "PE14_001_PRODUCTION DATA."

Response 1

The number of subject vehicles manufactured for sale or lease in the United States and federalized territories is provided in the following table.

MODEL	Engine	2007	2008	Total
CAMRY HV	2AZ-FXE	68,404	32,087	100,491

In addition, the detailed information responsive to "a" through "h" is provided electronically on DVD in Microsoft Access 2003 format entitled "PE14_001_PRODUCTION DATA.mdb" stored in the folder "Attachment-Response 1." For subpart "d," Toyota is providing the service part number of the transaxle assembly, which includes the electric motor, because no specific part number is available for the electric motor.

2. State, by model and model year, the number of MY 2007 through 2008 Toyota Camry HEV Toyota has manufactured for sale or lease in the United States and federalized territories for which Toyota has sold an extended service plan. For vehicles with more than one extended service plan, list the vehicle separately for each plan. Separately, for each vehicle, state the following:
 - a. Vehicle Identification number (VIN);
 - b. Model;
 - c. Model Year;
 - d. Name of battery, powertrain or chassis extended service plan;
 - e. Mileage at which the extended service plan expires; and

- f. Number of months from the warranty start date at which the extended service plan expires.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE14_001_SERVICE PLAN DATA."

Response 2

The number of the subject vehicles for which Toyota sold an extended service plan is provided, by model and model year, as "Attachment-Response 2". Please note that this "Attachment-Response 2" contains trade secret and commercial information; therefore, Toyota believes that this document should be afforded confidential treatment. A request for confidential treatment of this document has been sent to the Office of Chief Counsel. A public version of this document is included with this response.

In addition, the detailed information responsive to "a" through "f" is provided electronically on DVD in Microsoft Access 2003 format entitled "PE14_001_SERVICE PLAN DATA.mdb" stored in the folder "Attachment-Response 2." Please note that this attachment contains consumer information provided by Toyota's financial services subsidiary and is subject to safeguarding under applicable federal regulation. Accordingly, Toyota has encrypted this attachment and is providing the encryption key along with the request for confidential treatment to the Office of Chief Counsel.

3. State, by model, engine and model year, the number of each of the following, received by Toyota, or of which Toyota is otherwise aware, which relate to, or may relate to, the alleged defect in MY 2007 through 2008 Toyota Camry HEV:
- a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims;
 - e. Third-party arbitration proceedings where Toyota is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Toyota is or was a defendant or codefendant.

For subparts "a" through "d," state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" through "f," provide a summary description of the alleged problem and causal and contributing factors and Toyota's assessment of the problem, with a summary of the significant underlying

facts and evidence. For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response 3

For purposes of identifying reports of incidents which relate to, or may relate to, the alleged defect on the subject components, Toyota used the following categorizations in the review of each report for subparts “a” through “f”.

Category	Description
A1	Reports of inoperative braking or complete brake failure possibly resulting from an ABS actuator failure
A2	Reports of insufficient braking force or abnormal brake pedal feel possibly resulting from an ABS actuator failure
A3	Reports of warning lamp illumination only possibly resulting from an ABS actuator failure
A4	Reports of ABS actuator abnormal noise
A5	Reports of ABS actuator replacements for unknown reasons
B	Reports of warning lamp illumination, abnormal noise, or abnormal brake performance possibly resulting from a brake pedal stroke sensor failure
C	Reports of warning lamp illumination, abnormal noise, or abnormal brake performance possibly resulting from a brake fluid reservoir assembly failure
D1	Reports of inoperative braking or complete brake failure for unknown reasons
D2	Reports of insufficient braking force or abnormal brake pedal feel for unknown reasons
D3	Reports of warning lamp illumination for unknown reasons
D4	Reports of insufficient or abnormal braking performance and warning lamp illumination for unknown reasons
D5	Reports of brake lock-up for unknown reasons
E	Reports of abnormal brake system noise for unknown reasons
F	Reports of warning lamp illumination, abnormal noise, abnormal brake performance possibly resulting from a brake master cylinder failure
G	Reports of warning lamp illumination, abnormal noise, abnormal brake performance possibly resulting from a brake pedal stroke simulator failure
H	Reports of warning lamp illumination, abnormal noise, abnormal brake performance possibly resulting from a skid control computer failure

Toyota is providing reports of incidents in all the categories described above in response to the request for reports which relate to, or may relate to, the alleged defect on the subject components, with the exception of categories “D3” and “E.” The 109 reports in these categories are not responsive due to the ambiguity of, or lack of, the information available to support a determination that these reports relate to, or may relate to, the alleged defect. In addition, although Toyota is providing reports of incidents in categories “D” and “A5” in

order to be responsive to the request, no conclusion can be made about these incidents or whether they may relate to the alleged defect due to the lack of available information to analyze the allegations. Toyota will provide these reports, accompanying information, and basis for excluding these reports, if requested by the agency.

For all reports being provided, multiple incidents involving the same vehicle are counted separately, and multiple reports of the same incident are also counted separately.

Using the methodology described above, the number of reports which are responsive to this request are provided electronically on DVD in Excel format entitled "Total Count for Reports.xlsx" stored in the folder "Attachment-Response 3."

For items "c" through "f", the additional requested information, where available, is also provided in "Total Count for Reports.pdf."

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:
 - a. Toyota's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any; and
 - l. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE14_003_REQUEST NUMBER FOUR DATA."

Response 4

The information "a" through "l" for each item (complaint, report, etc.), where available, is provided electronically on DVD in Microsoft Access 2003 format entitled "PE14_001_REQUEST NUMBER FOUR DATA.mdb" stored in the folder "Attachment-Response 4". In addition, Toyota is providing information pertaining to the individual categories described in the previous response for each item listed in the attachment.

5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Toyota used for organizing the documents.

Response 5

Records of consumer complaints, records of dealer field reports (i.e., Technical Assistance System (TAS) calls and dealer product reports), copies of Toyota field reports, documents related to the claims and notices, and documents related to third-party arbitration cases, where available, are all provided electronically on DVD in PDF format or in Excel format stored in the folder "Attachment-Response 5." (The records of consumer complaints are stored in the sub-folder "Consumer Complaints." The TAS call records are stored in the sub folder "TAS." Copies of Toyota field reports and dealer product reports are stored in sub-folder "Field Reports." Copies of documents for the third-party arbitration cases are stored in the sub-folder "Arbitration.")

6. State, by model, engine and model year, total counts for all of the following categories of claims, collectively, that have been paid by Toyota to date that relate to, or may relate to, the alleged defect in MY 2007 through 2008 Toyota Camry HEV: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Toyota's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Whether a claim for towing was made within five days of the claim date;
- f. Vehicle mileage at time of repair;
- g. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- h. Labor operation number and description;
- i. Problem code and description;
- j. Replacement part number(s);
- k. Replacement part supplier and description;
- l. Concern stated by customer;
- m. Cause and Correction stated by dealer/technician; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2003 or 2007, or a compatible format, entitled "PE14_003_WARRANTY DATA."

Response 6

The total count of warranty claims, extended warranty claims, and claims for good will services paid by Toyota for the subject vehicles that relate to, or may relate to, the alleged defect in the subject components are provided electronically on DVD in PDF format entitled "Total Count for Claims.pdf" stored in the folder "Attachment-Response 6". The detailed information for each claim, where available, is also provided electronically on DVD in Microsoft Access 2003 format entitled "PE14_001_WARRANTY DATA.mdb" stored in the folder "Attachment-Response 6." Please note that this attachment contains consumer information provided by Toyota's financial services subsidiary and is subject to safeguarding under applicable federal regulation. Accordingly, Toyota has encrypted this attachment and is providing the encryption key along with the request for confidential treatment to the Office of Chief Counsel.

7. Describe in detail the search criteria used by Toyota to identify the claims identified in response to Request No. 6, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Toyota on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered).

Response 7

The search criteria used by Toyota to identify the claims is as follows:

Toyota searched the warranty, extended warranty (service contract) and goodwill service databases for those claims that replaced any of the part numbers identified in the PDF file entitled "Search Criteria, Operation & Problem Codes.pdf" stored in the folder "Attachment-Response 7" on DVD. Each claim condition, cause, and remedy description was then reviewed and determined to be responsive under similar guidelines to those set forth in Response No. 3.

A list of all labor operations, labor operation description, problem codes and problem code descriptions identified in these warranty claims, extended warranty claims, and goodwill claims are also provided in the same file described above.

The terms that Toyota offers for new vehicle warranty coverage on the subject vehicles are as follows:

For brake system-related components

36 months or 36,000 miles from the vehicle's date-of-first-use, whichever occurs first.

8. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Toyota has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletin, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Toyota is planning to issue within the next 120 days.

Response 8

Toyota is providing TSB 0174-12 electronically on DVD in PDF format entitled "Attachment-Response 8.pdf." Toyota has not issued and is not planning to issue any additional service bulletins concerning the alleged defect.

9. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to the alleged defect that have been conducted, are being conducted, are planned, or are being planned by, or for, Toyota. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

The response to this request should include a detailed description of all past, present and future actions by any and all engineering working groups (e.g., vehicle dynamics control task force) of which Toyota is an active member or is otherwise aware. This includes, at a minimum, all of the information requested in items "a" through "f."

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

Response 9

Toyota plans to provide a response to this request by April 16.

10. Describe all modifications or changes made by, or on behalf of, Toyota in the design, material composition, manufacture, quality control, supply, or installation of the subject system, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number(s) (service and engineering) of the original component;
 - e. The part number(s) (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and

Also, provide the above information for any modification or change that Toyota is aware of which may be incorporated into vehicle production within the next 120 days.

Response 10

Toyota has summarized in a table modifications or changes made by or on behalf of Toyota, in the design, material composition, manufacture, quality control, supply, or installation of the subject component, which relate to, or may relate to, the alleged defect in the subject vehicles. We are providing this information electronically on DVD in PDF format entitled "Attachment-Response 10.pdf" stored in the folder "Attachment-Response 10." Please note that some of the information included in the "Attachment-Response 10" is confidential, and a request for confidential treatment has been submitted to the Office of Chief Counsel. A public version of "Attachment-Response 10" is included with this response to your office, provided on DVD stored in the folder "Attachment-Response 10." Please see the documents submitted to the Office of Chief Counsel for the confidential version of this document.

11. Produce one sample of each of the following:
- a. Representative sample of a new MY 2007 brake actuator assembly; and
 - b. Field return sample of the MY 2007 subject systems exhibiting the subject failure mode.

Include the following information about the parts provided in response to this request: (1) the vehicle identification number; (2) the repair claim number; and (3) copies of all documents related to analysis of the part.

Response 11

Toyota plans to provide a response to this request by April 16.

12. Provide a graphic and written description of the primary components of MY 2007 through 2008 Toyota Camry hybrid braking systems. Include in detail the following:
 - a. The strategy Toyota implemented to incorporate regenerative and hydraulic braking at all speed ranges (i.e. low speed thru high speed) during normal braking (i.e. no wheel slip);
 - b. The strategy Toyota implemented to incorporate regenerative and hydraulic braking at all speed ranges (i.e. low speed thru high speed) during an ABS stop (i.e. wheel slip);
 - c. The effect of battery charge (through the complete range of charge) on the hybrid braking system during normal and ABS braking events;
 - d. Brake force generation diagrams including regenerative and hydraulic forces, accelerator pedal on/off states, brake pedal stroke position and effort, vehicle speed, deceleration rates, gear states and any designed-in cooperative regeneration characteristics;
 - e. Brake actuator specifications requirement documents and system DRBFM or D-FMEA; and
 - f. All controller and sensor software diagnostic routines and test cycles performed at runtime and power-up.

Response 12

In response to subparts “a” and “b,” Toyota is providing appropriate pages of the New Car Features (NCF) for descriptions of the braking strategy used in the subject vehicles electronically on DVD in PDF format entitled “Attachment-Response 12-1.pdf” stored in the folder “Attachment-Response 12.”

In response to subpart “c” and “d,” under normal driving, when the hybrid battery reaches full charge (which occurs at approximately 70-80% state of charge in normal driving conditions, the regenerative braking system is disabled due to the inability to recharge the battery further. Total braking force to meet driver demand is supplied by the hydraulic brakes. When the hybrid battery reaches a state where recharging is possible, total braking force is supplied by a combination of hydraulic braking and regenerative braking, with hydraulic braking providing the dominant brake force when the vehicle speed is high. By design, regenerative braking is not used when the vehicle speed is very low or during an ABS stop. Toyota is providing a graphical illustration of the hydraulic/regenerative brake system cooperative force generation electronically on DVD in PDF format entitled “Attachment-Response 12-2.pdf” stored in the folder “Attachment-Response 12.” Please note that Toyota is unable to provide quantitative data behind the diagrams depicted in the attachment without separate vehicle testing.

In response to subpart “e,” the brake actuator specifications are provided electronically on DVD in PDF format entitled “Attachment-Response 12-3.pdf” stored in the folder “Attachment-Response 12.” The braking system

FMEA is provided electronically on DVD in PDF format entitled "Attachment-Response 12-4.pdf" stored in the same folder.

In response to subpart "f," Toyota is providing on-board brake system diagnostic information electronically on DVD in PDF format entitled "Attachment-Response 12-5.pdf" stored in the folder "Attachment-Response 12." Please note that the hybrid braking system in the subject vehicles contains several thousand diagnostic routines for the monitoring of system performance and immediate detection of possible malfunctions. In accordance with previous discussions with the agency, due to the high volume of diagnostic information, the information provided in "Attachment-Response 12-5" includes those diagnostic routines which could detect system malfunctions that relate to, or may relate to, the alleged defect in the subject components.

Please note that the information included in the "Attachment-Response 12-3," "Attachment-Response 12-4," and "Attachment-Response 12-5" is confidential, and a request for confidential treatment has been submitted to the Office of Chief Counsel. Public versions of these attachments are included with this response to your office, provided on DVD stored in the folder "Attachment-Response 12." Please see the Office of Chief Counsel for the confidential version of these documents.

13. Furnish Toyota's assessment of the alleged defect in the hybrid braking systems of the subject vehicles. Provide separate responses for each condition that may result in loss of assisted braking. Include the following information for each condition:
 - a. The causal or contributory factor(s);
 - b. The failure mechanism(s);
 - c. The failure mode(s), including the specific operating conditions at which the loss of assisted braking can occur (e.g., vehicle speed);
 - d. Toyota's assessment of the safety risk of each condition, including all incidents alleging
 - e. increased stopping distance in traffic lanes and all incidents alleging crashes;
 - f. Toyota's assessment of factors affecting the operator's ability to resume safe operation of the vehicle, including reports alleging repeatable system malfunction after restarting the vehicle; and
 - g. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the system may be about to malfunction **before** the vehicle loses assisted braking.

Response 13

Toyota plans to provide a response to this request by April 16.

* * *

Data provided in this document is current as of the following dates:

Response		Dates
Response 1	Production Data	January 24, 2014
Response 2	Service Plan Data	January 24, 2014
Response 3 - 5	Consumer Complaints	January 24, 2014
	Field Reports	January 24, 2014
	TAS and Dealer Product Reports	January 24, 2014
	3 rd Party Arbitration	January 24, 2014
	Claims and Notices (from Legal Department)	January 24, 2014
Response 6	Warranty Claims	January 24, 2014
	Goodwill	January 24, 2014
	Extended Warranty Claims	January 24, 2014
Response 7	Search Criteria and Warranty Coverage	January 24, 2014
Response 8	Dealer Communications	January 24, 2014
Response 10	Modifications/Changes	February 4, 2014
Response 12	Brake System Information	February 4, 2014

In responding to this Information Request (“IR”), based on clarification received from the agency, the following definitions have been used:

Subject Components:

System components related to braking actuation or brake pedal effort control such as Anti-lock Braking System (ABS) actuator, skid control ECU, brake fluid reservoir tank, brake pedal stroke sensor assembly, software, wiring and other components manufactured for use as original equipment or service replacement parts in the subject vehicles.

Alleged Defect:

1. Allegations of loss of assisted braking;
2. Allegations of brake actuator malfunction;
3. Allegations of increased brake pedal effort;
4. All malfunctions listed above which may also result in system indicator lamp illumination and/or diagnostic trouble codes;

In the foregoing responses to this IR information has been obtained from those departments and employees knowledgeable about the subject matter of this inquiry most likely to have such information in the regular and ordinary course of business. When a particular Request seeks “documents” as defined in the IR, reasonable, good faith searches have been made of corporate records where such documents would ordinarily be expected to be found and to which Toyota would ordinarily refer when looking for such information.

The definitions of “documents” and “Toyota”, however, are unreasonably broad, vague, and ambiguous, and Toyota objects to such definitions, because they exceed a reasonable understanding of such terms. For example, “calendars”, “travel reports”, “contracts” and “personnel records”, to name a few, would not normally contain responsive information pertaining to the alleged defect subject of this inquiry. Toyota has also not provided information from electronic files that require extraordinary or expert means to retrieve that are generally unavailable to the computer user.

In addition, Toyota has not provided information from persons or entities over which it does not ordinarily exercise control, such as independent suppliers and contractors. Toyota also objects to the definition of “Toyota” to the extent it purports to include outside counsel. It would be unduly burdensome to require Toyota to request that outside counsel search files for responsive documents. Moreover, it is highly unlikely that outside counsel would possess any non-privileged documents responsive to this IR that are not already being produced by Toyota. In light of the significant burden and cost associated with canvassing outside counsel for potentially responsive documents and the very low probability of identifying any non-privileged document not already being produced, Toyota has not asked its outside counsel to search for responsive documents.

Toyota understands this IR to seek information on vehicles manufactured for sale in the United States and its

territories. Also, we understand documents specifically related to the preparation of the responses are not sought.

The source of information used as a basis for the data in each Attachment, including the date the data were updated and retrieved, is identified above as applicable. If a document itself is the source for the requested information and it is provided, no further source identification is provided. If a document, drawing or component is requested, or if no responsive information is available, we assume no further source identification is called for.

Toyota is not providing privileged documents that may be responsive to this Information Request. With regard to claims of privilege, Toyota understands that it is acceptable to the Agency for Toyota to identify specific categories of privileged documents rather than any specific document within those categories. These categories include: (a) communications between outside counsel and employees of Toyota's Legal Department, other Toyota employees, or employees of parties represented by Toyota in litigation and claims; (b) communications between employees of Toyota's Legal Department and other Toyota employees, or employees of parties represented by Toyota in litigation and claims; (c) notes and other work product of outside counsel or of employees of Toyota's Legal Department, including work product of employees or consultants done for or at the request of outside counsel or Toyota's Legal Department. For any privileged documents that are not included in these categories, if any, Toyota will provide a privilege log identifying any such document under separate cover. Toyota is not claiming a legal privilege for any documents provided with this response; however, Toyota does not waive the legal privilege or work-product protection with respect to other documents that may have been prepared in connection with a specific litigation or claim. In addition, Toyota may assert the attorney-client privilege or claim protection under the work-product protection for analyses or other documents that may be prepared in connection with litigation or claims in the future.

Toyota understands that NHTSA will protect any private information about persons that is contained in the Attachments to this response, based on privacy considerations. Such private information includes data such as names, addresses, phone or fax numbers, email addresses, license plate numbers, driver's license numbers and the last 6 digits of a vehicle's VIN.