

**Addendum to Motor Vehicle Defect Petition:
Petition to Recall Tesla Vehicles Due To SUA**

James C. Owens
National Highway Traffic Safety Administration
400 Seventh Street, S.W.,
Washington, DC 20590

December 19, 2019

Dear Acting Administrator Owens:

Thank you for receiving this addendum to a previous petition to recall Tesla vehicles due to Sudden Unintended Acceleration.

In the three months since filing a Motor Vehicle Defect Petition with your office and today's Addendum to the Petition, Tesla owners have filed SUA complaints involving thirteen vehicles with the NHTSA, two of the owners alleging multiple SUA events. This Addendum asks NHTSA to consider these complaints as part of the original petition. Also included are two stories of Tesla unintended acceleration crashes from local media, which resulted in a total of four injuries.

According to several of the complaints below as well as Tesla SUA victims I have contacted personally, Tesla continues to be unresponsive. Victims find it difficult to access their own vehicle data, and difficult even to contact the company.

For your reference, here are the complaints you have received from the public relating to Tesla SUA problems:

Tesla Model	Model Year	NHTSA #	Complaint Date	Location
Model S	2016	11257753	9/24/2019	New York, Centerport
Model 3	2019	11265452	10/1/2019	Oregon, Beaverton
Model X	2019	11266551	10/6/2019	California, Bakersfield
Model 3	2019	11267131	10/8/2019	Pennsylvania, Wexford
Model 3	2018	11268280	10/14/2019	California, Fremont
Model S	2019	11269912	10/21/2019	Tennessee, Germantown
Model 3	2019	11278152	11/4/2019	Texas, Leander
Model S	2015	11278322	11/5/2019	California, Danville
Model 3	2019	11279755	11/13/2019	California, Inglewood
Model S	2016	11280962	11/19/2019	Pennsylvania, Avondale

Addendum to Motor Vehicle Defect Petition: Petition to Recall Tesla Vehicles Due To SUA

Model 3	2019	11282993 & 11282996	11/30/2019	USA, Unknown
Model S	2013	11289019	12/14/2019	Massachusetts, Andover
Model X	2018	11289172	12/15/2019	California, Menlo Park

On September 24th, 2019, the owner of a 2016 Tesla Model S in Centerpoint, New York, wrote a complaint to the NHTSA, the relevant portion of which is copied below:

As usual, I drove Tesla to work. My parking spot is a head-in parking spot. To park my car I have to make a 90-degree turn, so I pressed the breaks to slow the car. Just as the car completed the 90-degree turn and I was about to stop the car to complete parking, it accelerated out of control. It jumped the curb in the front and hit bushes about 5-6 feet ahead. The car suffered extensive damage that is estimated to cost about \$20,000.

I also trust that Tesla is committed to making Tesla 100% safe to drive. Therefore, it is in both parties' interest to find what exactly happened. Fortunately, Tesla keeps track of every movement that every Tesla makes. The record can prove beyond doubt what exactly happened. I, therefore, request a complete record of what happened at the time of the incident.

This incidence happened between 9:50am and 10am EST on August 22, 2019.

As I was making a 90-degree turn to park, your record would certainly show that I pressed the breaks during the turn. The only way I could have put the car in the high acceleration - that my wife and I noticed - would be that I lifted my feet from the break and instantly pressed very hard on the accelerated paddle. I cant understand how that be feasible. If the record does not show this precise pattern, than it points to a potential software flaw.

Please provide me and the National Highway Traffic Safety Administration (NHTSA) with the complete record of every event that happened with my car on August 22, 2019 between around 9:50am and 10am.

On October 1, 2019, NHTSA received a complaint of unintended acceleration from law enforcement in Beaverton, Oregon, relating to a 2019 Tesla Model 3. The relevant portion of the complaint says:

*Law Enforcement Entry - Vehicle was involved in a 10-vehicle crash. Driver and passenger both stated vehicle had unintended acceleration. Addition witness statements appear to verify report. *DT*

Addendum to Motor Vehicle Defect Petition: Petition to Recall Tesla Vehicles Due To SUA

As vehicle was traveling on the highway, the driver reportedly tried to slow the vehicle as it approached stopped/slowed traffic. Vehicle did not respond and driver was not able to slow it before it crashed into stopped traffic.

On October 6, 2019, NHTSA received an unintended acceleration complaint involving an injury, this time from Bakersfield, California, relating to a 2019 Tesla Model X. The complaint says:

*While I was parking sudden acceleration occurred vehicle jumped the curb and the vehicle smashed the building went thru the wall. **There were twice prior incidents** with no accident but freaking out within last 4 weeks. The vehicle was in motion in city street all three instances. **All three incidents I was turning the corner or parking with less than 5 miles per hour.***

NHTSA received a complaint on October 8, 2019 from Wexford, Pennsylvania, involving two injuries and relating to a 2019 Tesla Model 3. The complaint says:

My wife was trying to park the car in our garage when the car suddenly sped up and hit our inner garage wall. It then reversed back and hit the wall a second time. Then it automatically reversed and parked on the neighbor's driveway. Both the sterling air bag and airbag near the feet deployed. The car's front was smashed. Our garage wall and door are also badly damaged. I have asked Tesla to investigate if it was because of the autopilot taking over but have not received a response from them yet after more than a week.

On October 14, 2019, NHTSA received a complaint from a 2018 Tesla Model 3 owner in Fremont, California, which says:

*Hello - I was trying to park my vehicle in a parking spot in Santa Clara, California when **the car automatically accelerated and hit another car**. It then immediately had a flat tire. **I did not hit the wrong pedal nor was I accelerating it**. It was quite dangerous. It came to a halt after hitting another car. Both the cars were damaged. Prior to that we had difficulty trying to connect to the car using the app on the phone but thought it could have been due to an app error. Not sure if it was correlated. This event happened on Sep 24. Tesla advised me to tow the car to the service center. Since then my car has been with Tesla Service. They have not given us any updates about the diagnostics and keep telling us to take the car back. They have cleared to drive the car for 20 miles. My car was extensively damaged. I request your help. This is quite serious for the safety of everyone. While I am willing to accept if Tesla proves beyond doubt that it was my error, I am quite confident that it did it automatically. I am also concerned that **Tesla has not given us any update for the last 3 weeks** and have not provided us with any details of what the course of action is beyond asking us to take the car back and clearing it to drive*

Addendum to Motor Vehicle Defect Petition: Petition to Recall Tesla Vehicles Due To SUA

for 20 miles. I have 2 kids and want a thorough investigation for the safety of everyone involved. Please help.

On October 21, 2019, Visanji Gala of Germantown, Tennessee experienced a similar SUA crash in his 2019 Tesla Model S while parking in his garage. The relevant portion of his report to the NHTSA says:

The contact owns a 2019 Tesla Model S. While the contact was pulling into the driveway at 4 MPH, the vehicle accelerated and crashed into the garage door and wall. The air bags did not deploy, and the steering wheel and brakes seized.

This crash attracted some media attention. Writing for InsideEVs.com, [REDACTED] quotes Mr. [REDACTED] referring to his car as “possessed by a demon”, not the first Tesla SUA crash victim to use this analogy.²

[REDACTED] quotes Mr. [REDACTED] as saying:

As if possessed by a demon, the Tesla had a mind of its own and decided to go to Garage 1. I hoped it would stop as the door was closed. I tried hard to steer it to Garage 3 but I had no control over the steering wheel. It just would not budge. I tried to brake but even the brakes did not work.

The car broke through the closed garage door and hit a heavy treadmill, pushing it aside by a few feet. It went through the sidewall of the utility room before being forced by items stored there to stop. I am not sure why it stopped.

I have no clue what happened. I am guessing some type of malfunction. I am in shock, really flabbergasted to explain or understand what happened. I have tried tweeting Elon Musk.

After 40 minutes on hold and going through several numbers, all they said was ‘your insurance will handle the claim.’ No help from Tesla.

On November 4, 2019, NHTSA received a SUA complaint from the owner of the 2019 Tesla Model 3 in Leander, Texas. The complaint says:

I turned into a perpendicular parking space in a home depot parking lot. I let up on the accelerator as the car inched closer to the curb. As I began to press the brake to bring the car to a complete stop, the car suddenly lurched forward, jumped the curb, crossed

[REDACTED]

Addendum to Motor Vehicle Defect Petition: Petition to Recall Tesla Vehicles Due To SUA

the grass median and come to rest on the hood of another car. I know my foot was on the brake at the time and contend that the incident was due to a vehicle malfunction.

On November 5th, 2018, NHTSA received another complaint from the owner of a 2015 Tesla Model S in Danville, California. This complaint may be associated with autopilot and not SUA, I include this complaint here because the complainant specifically notes unintended acceleration. The relevant portion of the complaint says:

The contact owns a 2015 Tesla Model S. While driving 65-70 MPH for thirty minutes with the auto pilot engaged, the vehicle spontaneously accelerated without warning. The contact crashed into the rear of a 2015 Toyota Prius.

On November 13, 2019, a 2019 Tesla Model 3 owner in Inglewood, California, complained to the NHTSA of unintended acceleration. The complaint reads:

I was parking in my drive way. I thought I placed the car in park. My foot was on the brake.

So I opened the driver door. When I took my foot off the brake the car lunged forward. The door was opened and I had both feet outside the door.

I tried to push the park button.

The car went into reverse.

This caused the driver door to impact the building and damage the door.

On November 19, 2019, NHTSA received a complaint from the owner of a 2016 Tesla Model S which crashed in an elementary school parking lot in Avondale, Pennsylvania. The owner alleges unintended acceleration in the NHTSA complaint.

My wife was pulling into a parking spot at her school at a slow rate of speed (as she was parking between 2 cars). The vehicle was in chill mode, which means that it cannot accelerate at a high rate of speed. When she was roughly ¾ of the way into the parking spot with her foot on the brake, the vehicle accelerated on its own as if it was in performance mode. It went over a curb and into a chain link fence (which was roughly 10-12 feet past the curb) before she could get the vehicle to stop itself. This was at an elementary school and children were present. Fortunately no one was hurt. Tesla has yet to respond to our inquiries regarding the incident.

Addendum to Motor Vehicle Defect Petition: Petition to Recall Tesla Vehicles Due To SUA

On November 30, 2019, NHTSA received two complaints involving separate SUA incidents in the same vehicle. The first complaint states:

On November 29, 2019, we were driving our 5-month-old Tesla Model 3. We were coming to a stop at a stoplight in heavy traffic, when suddenly the car accelerated on its own. My husband had to brake suddenly to prevent running into another car.

The second complaint, involving the same car as above, says:

On 11-27-19, [our] Tesla Model 3 which is 5 months old suddenly accelerated in traffic. My husband was driving about 20 miles an hour at the time. This also occurred on 11-29-19, in a more dangerous situation. I made a separate report for that date. Fortunately, no collision occurred, but we are scared now.

On December 14, 2019, NHTSA received a SUA complaint involving a 2013 Tesla Model 3 in Andover, Massachusetts. The complaint reads:

*On Tuesday, December 10, my wife was slowly approaching our garage door waiting for the garage door to open **when the car suddenly lurched forward** [with] speed such that the car went through the garage door destroying two garage doors, the load bearing column between the two doors. A lolly column inside the garage was broken in two pieces and our other car in the garage was damaged as were other items in the garage. The car eventually stopped when it hit the concrete wall of the garage but two marks on the garage floor indicate the rear drive wheels continued to spin even after hitting the concrete wall. We are the original owners of this car and have driven it for 6 ½ years so we are very familiar with the car. Thankfully, she was not injured.*

On December 15, 2019, the owner of a 2018 Tesla Model X complained to the NHTSA of a SUA crash. The complaint says:

Using the self-park system, from a stationary position and pressing the touch screen prompts to use the self-park, and having hands and feet away from the gas, brake and steering wheel, and parking between two cars, the car accelerated backward on its own and I had to slam my foot on the brake to stop it but it still hit a pole going in reverse and damaged the body of the car. Had I not hit the brake my son and I would have been injured. Tesla has denied responsibility.

In addition to the NHTSA complaints, there have been several recent media reports of unintended acceleration events in Tesla vehicles. I would like to draw your particular attention to two recent reports.

Addendum to Motor Vehicle Defect Petition: Petition to Recall Tesla Vehicles Due To SUA

On November 13, 2019, a Tesla Model 3 went through the wall of a Smithtown, New York, CVS Pharmacy while attempting to park. The driver and a responding police officer were injured in the incident.³

And on December 17, 2019, a Tesla Model S went through the front wall of the British Pride Bakery in Burlington, Ontario, Canada, while attempting to park. The driver and a bakery employee were injured in the crash.⁴

Please feel free to contact me at your convenience should you require anything further.

[REDACTED]

[REDACTED]

³

[REDACTED]

DP20-001

PETITIONER 12-19-2019,
Addendum to Motor Vehicle
Defect Petition

Analysis of EDR Data

Analysis of EDR Data

Figure 1 shows plots of all the pre-crash accelerometer data obtained from the EDR report of 2019/07/25 22:44:10 (UTC), along with the plotted vehicle speed data.

Analysis of the data provides three major conclusions:

- 1) The steering wheel angle data and the yaw rate data are not consistent with each other.
- 2) If the sign of the steering wheel angle data is changed, then all the accelerometer data become consistent with each other, showing that the vehicle veered to the left as shown in Figure 2, in agreement with the driver's testimony and with the damage to the right front corner of the vehicle as supported by repair records.
- 3) All accelerometer data plots show a change in the sign of the acceleration at around -1.0 seconds before the final crash, indicating possible contact with a crushable object before contact is made with a more impenetrable wall at 0.0 sec.

These conclusions will now be discussed in more detail.

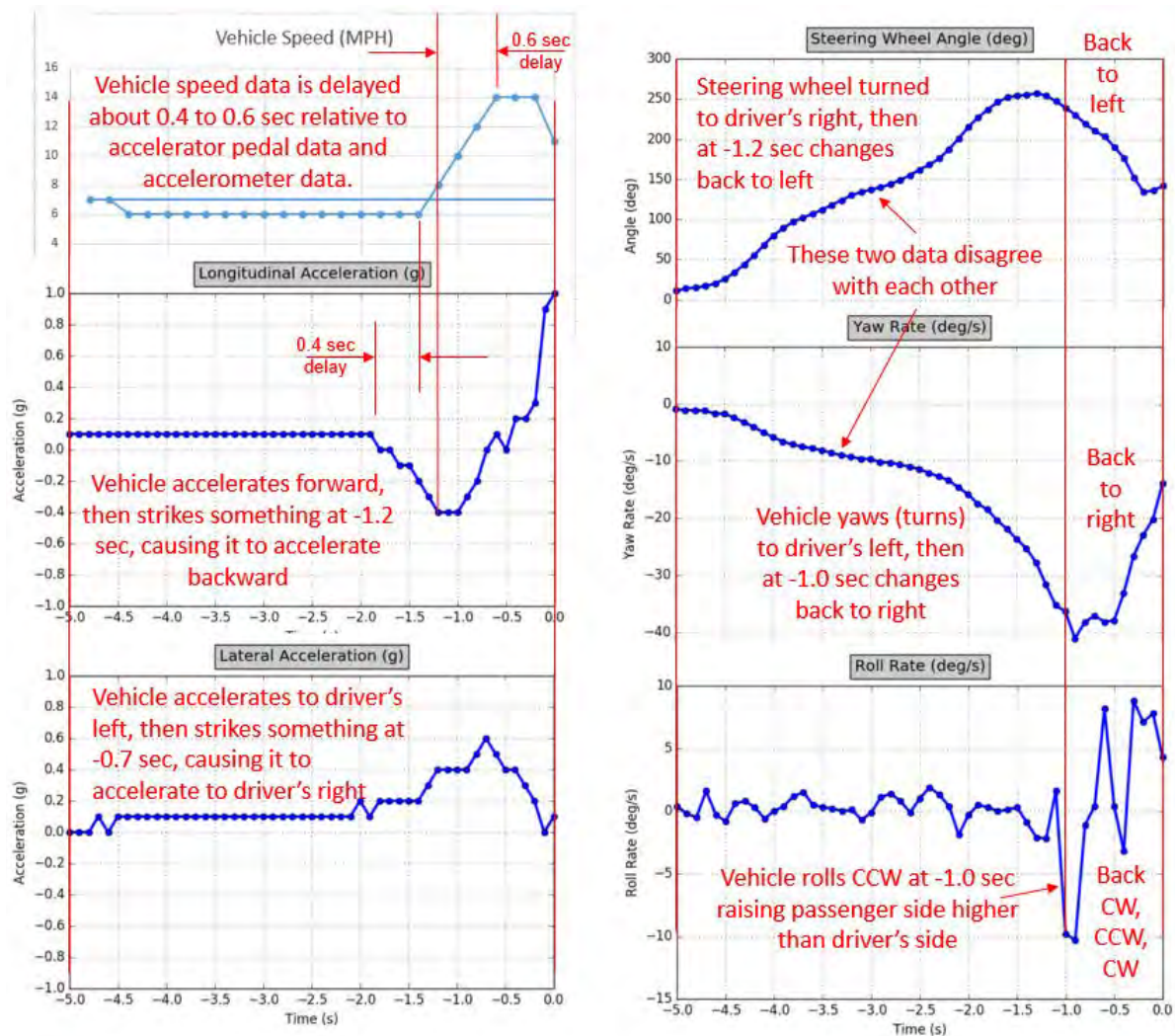


Figure 1. Pre-crash accelerometer data plots

1. Steering wheel angle data and yaw rate data are not consistent with each other. By definition, yaw is the rotation of a vehicle about a vertical axis, with positive yaw values indicating a rotation to the driver's right. Therefore, the negative yaw values in the yaw rate data of Figure 1 indicate a rotation of the vehicle to the driver's left with the rate of rotation increasing with time, and then decreasing again. This is incompatible with the steering wheel angle data, which shows positive values indicating a turn of the steering wheel to the right and then back to the left. What this means is that one of these plots has the wrong sign, indicating that one of the plots does not conform to the SAE 211 / SAE J670 standards mandated by NHTSA in its Part 563 EDR rule dated Sept 2012. Why this wrong sign exists is unknown, and may indicate a mistake by Tesla when designing the EDR system.
2. If the sign of the steering wheel angle data is changed, then all the accelerometer data become consistent with each other, showing:
 - a. the vehicle accelerated forward as shown by the longitudinal acceleration data showing a forward acceleration followed by a rearward acceleration caused by crashing into an object. The acceleration caused by the crash reached a value of 1g, triggering the recording of the EDR data, but not the excitation of the air bags.
 - b. the vehicle veered to the left before the crash as shown in Figure 2. This is supported by:
 - 1) the revised steering wheel angle data now agreeing with the yaw rate data,
 - 2) the lateral acceleration data showing that the vehicle accelerated first to the left and then to the right, and
 - 3) the driver's testimony,
 - c. the vehicle struck an object with the right front fender as supported by:
 - 1) the lateral acceleration data showing that the vehicle first accelerated to the driver's left and then back to the driver's right,
 - 2) the roll rate data, showing that the vehicle first rolled counter-clockwise (CCW), raising the passenger side higher than the driver's side, and then back clock-wise (CW) again, followed by an additional CCW and CW rotation,
 - 3) the driver's testimony,
 - 4) repair records indicating damage to the right front fender area.
3. The vehicle may have made contact initially with a crushable object (like a garbage can, a planter, or something similar) before final contact was made with a more impenetrable object like the garage structure between the two garage doors. This is inferred from the observation that all accelerometer data plots show a change in the sign of the acceleration values at around -1.0 seconds before the final crash, with the reverse accelerations reaching their highest values at 0.0 seconds.

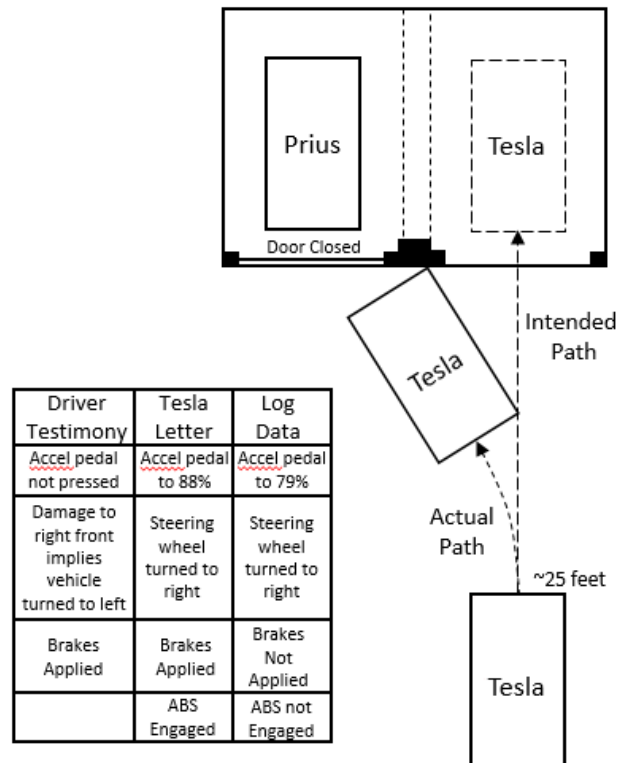


Figure 2. Vehicle path for the incident along with a table showing inconsistencies between the driver's testimony, the EDR data as interpreted by Tesla, and Tesla's letter to the driver.

This report shows the EDR data is consistent with the driver's testimony.

Figure 3 shows plots of the pre-crash data values of accelerator pedal depression (%), rear motor speed (RPM), and vehicle speed (MPH). One can make the following three inferences from these plots:

1. The maximum in the accelerator pedal data at -1.0 seconds corresponds roughly to the maxima in all the accelerometer data at about -1.0 seconds. This appears to show that the driver released the accelerator pedal after the vehicle initially made contact with a crushable object, but before the vehicle finally came to rest at 0.0 seconds. But this inference is merely an assumption until Tesla can prove that the recorded accelerator pedal data is actually obtained by storing the accelerator pedal sensor voltage values, and not some signal derived from the voltage data but possibly affected by other events occurring in the vehicle. Therefore, the dropping of the accelerator pedal data to a zero value may also imply that an accelerator-related signal derived from the accelerator pedal voltage stopped as a result of the shock caused by the vehicle hitting an object, which changed a related event. This possibility allows for events other than the accelerator pedal sensor value to influence the vehicle motion.
2. The rear motor speed (RPM) and the vehicle speed (PMH) are offset from the accelerator pedal (%) data by 0.2 seconds and 0.6 seconds, respectively. While some delay in these two responses may be expected, a delay of 0.2 seconds

between the accelerator pedal and the motor speed is quite large and should be detectable by the driver as a noticeable lag in accelerator response. It is not known if this is a normal lag value for the Tesla motor, or if this large value indicates that some non-normal process is at work in this incident. It is known, however, that in vehicles with internal combustion engines this delay is kept as far below 100 milliseconds as possible (typically about 30 to 70 milliseconds) to avoid the driver experiencing a lag in accelerator response.

3. The rear motor speed (RPM) plot shows that the motor RPM continued at about 1500 RPM for about 0.4 seconds after the accelerator pedal data went to zero. This is not a result of the 0.2 second delay of the motor RPM relative to the pedal data, but is in addition to the delay. The cause of this continuation in motor RPM is unknown at this time. It may imply that some other process is in control of the motor RPM in addition to the accelerator pedal data.

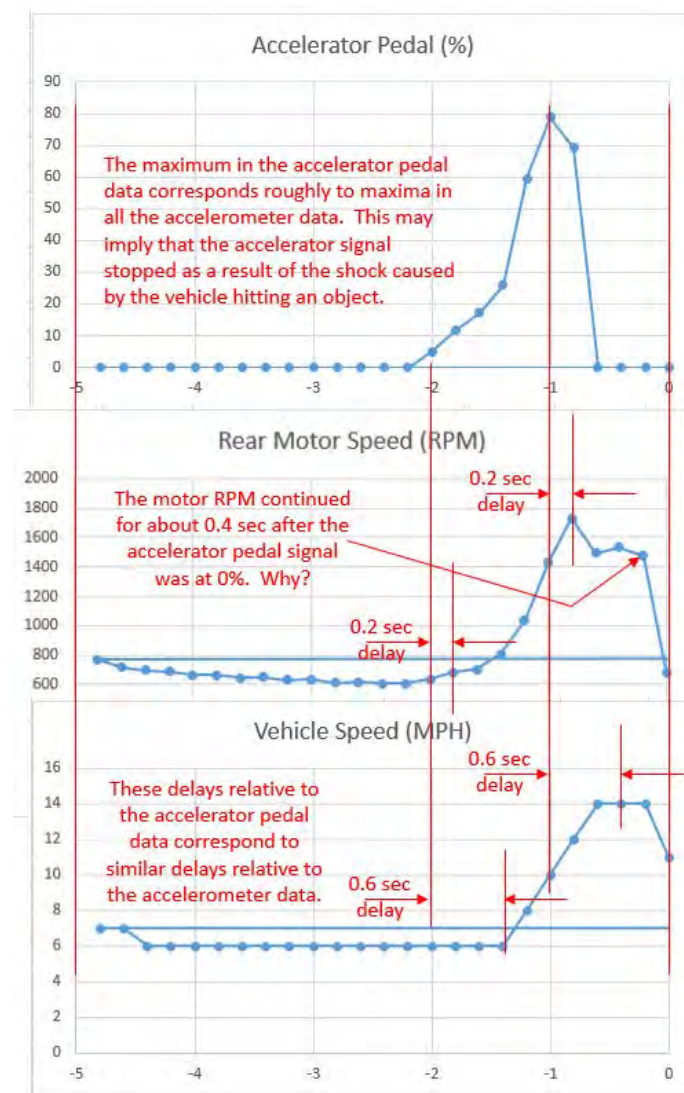


Figure 3. Plots showing recorded pre-crash values of accelerator pedal depression (%), rear motor speed (RPM), and vehicle speed (MPH)

DP20-001

PETITIONER 12-19-2019,
Addendum to Motor Vehicle
Defect Petition

2019-12-19 Petitioner email attachment
- Petition To Recall Tesla Vehicles Due To
Sudden Unintended Acceleration

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

James C. Owens
National Highway Traffic Safety Administration
400 Seventh Street, S.W.,
Washington, DC 20590

30 September 2019

Dear Acting Administrator Owens:

██████████ was driving her brand new 2019 Tesla Model 3 this summer when the vehicle's electrical systems failed and the car accelerated suddenly. ██████████ regained control of the vehicle but was badly shaken by the incident. She notified Tesla and requested an immediate service appointment, but was given an appointment several weeks later.

One week later, the same thing happened to ██████████ car again. This time, the sudden acceleration caused a four-car crash that injured two people.

I found one hundred and eight similar stories from Tesla owners on the National Highway Transportation Safety Administration's website, and news coverage of many similar unreported incidents. Using the data on NHTSA's Early Warning Reporting page, I calculated the number of Sudden Unintended Acceleration (SUA) reports per 100,000 car years. I compared this data to a control group. Tesla-made cars as a group have significantly higher reports of SUA than any car in the control group. The 2016 Tesla Model X has 3,000% more reports of Sudden Unintended Acceleration than the control group average, and over 6,000% more reports than the least-reported vehicle in the control group, among vehicles that had received at least one report of Sudden Unintended Acceleration.

I believe Tesla vehicles have a structural flaw which puts their drivers and the public at risk. I further believe Tesla must know of this flaw and be unresponsive to it. As this petition will show, many of the reports to NHTSA indicate that the driver has engaged with Tesla following their SUA event, and that Tesla refuses to share data with the owners of the vehicles in question. It is clear that Tesla has the data and is aware of the problem. This petition will show that, based on publicly available information, it appears **Tesla vehicles have a Sudden Unintended Acceleration Problem** and **Tesla must know about this problem**.

This information shows that there is a safety-related defect in Tesla vehicles. Therefore, the NHTSA must grant this Motor Vehicle Defect Petition and recall all Model S, Model X, and Model 3 vehicles produced from 2013 to the present.

██████████

██████████
██████████
██████████

Table of Contents

Cover Letter	i
Table of Contents	1
Statistical Analysis of SUA Complaints in NHTSA Database	2
Methodology	3
Media Reports of Tesla SUA	
First Media Reports	4
2019 Media Reports	6
Possible SUA Incidents in Media Reports	8
Complaints by Tesla Model/Year: Tesla Model X	
2016 Tesla Model X	9
2017 Tesla Model X	15
2018 Tesla Model X	17
Complaints by Tesla Model/Year: Tesla Model S	
2013 Tesla Model S	20
2014 Tesla Model S	28
2015 Tesla Model S	30
2016 Tesla Model S	37
2017 Tesla Model S	43
2018 Tesla Model S	49
Complaints by Tesla Model/Year: Tesla Model 3	
2018 Tesla Model 3	52
2019 Tesla Model 3	59
Conclusion	60
Appendix A - Control Group Data	61
Appendix B - Tesla Data	62
Appendix C - All Tesla SUA Complaints	63

Statistical Analysis of SUA Complaints in NHTSA Database

I compared every Tesla Model S, Model X, and Model 3 for which there is data on the NHTSA website from 2012 to the present¹ with a control group of nineteen vehicles selected as reasonable comparisons to the Tesla brand². I estimated approximate vehicle-years by simply calculating the difference between model-year vehicle and 2019. (I believe this is a measure favorable to Tesla, as the company does not produce model-year vehicles and would likely sell their vehicles to the consumer later in the year than other automakers, meaning I may be overcounting vehicle-years for Tesla relative to the control group.³) Tesla has a sample size of 757,208 vehicle-years, measured as described above, versus a control group with a sample size of 4,169,929 vehicle-years. During this time, NHTSA has received 109 complaints from Tesla owners claiming Sudden Unintended Acceleration, or approximately 14.39 SUA complaints per 100,000 vehicle-years versus 41 complaints for the control group, or slightly under one SUA complaint per 100,000 vehicle-years. This means that **Tesla owners have complained of SUA events 1440% more often** than control group vehicle owners. Although difficult to measure against ongoing production, approximately **one per 3500** Tesla-made cars has generated an NHTSA complaint for SUA, according to EWR data.

The data presented in the following pages will offer evidence that **Sudden Unintended Acceleration (SUA) problems are systemic in Tesla-made vehicles and warrant investigation and recall by the National Highway Transportation Safety Administration**. Tesla owners have reported several dozen injuries as a result of Tesla's SUA problem.

SUA complaints made to the National Highway Transportation Safety Administration are credible and those complaints involving Tesla recount fact patterns consistent with one another. Many similar instances which have led to crashes have not been reported to NHTSA but have been reported in the media. Few of the Tesla SUA complaints are consistent with "pedal entrapment" or "sticky pedal" explanations.

I am concerned that these complaints reflect a systemic defect that has not been investigated by NHTSA. I am also concerned that these potential defects represent risk to the safety of Tesla drivers, their passengers, and the public. Finally, I am concerned that Tesla may be aware that

¹ Tesla vehicles reviewed include the 2012 Tesla Model S; 2013 Tesla Model S; 2014 Tesla Model S; 2015 Tesla Model S; 2016 Tesla Model S and Model X; 2017 Tesla Model S, Model X, and Model 3; 2018 Tesla Model S, Model X, and Model 3; and 2019 Tesla Model S, Model X, and Model 3. See Appendix A.

² Control group vehicles reviewed include the 2013 Land Rover LR4, 2013 Nissan Leaf, 2013 Lexus RX 350, 2014 Ford Explorer, 2014 Mercedes Benz E-Class, 2015 Toyota Prius V, 2015 Nissan Pathfinder, 2015 Cadillac Escalade, 2016 Chevrolet Volt, 2016 Dodge Dart, 2016 Mercedes Benz C-Class, 2017 Chevrolet Bolt, 2017 Alfa Romeo Giulia, 2018 Honda Clarity PHV, 2018 Toyota Camry, 2018 Ford Fusion, and the 2018 Ford Focus. See Appendix B.

³ For example, most car manufacturers sold 2019 Model vehicles in December of 2018, whereas Tesla continued to sell 2018 vehicles in the first quarter of 2019.

their vehicles are prone to unintended acceleration and is failing to act in the interests of public safety as required under the Motor Vehicle and Traffic Safety Act.

Methodology

To calculate the number of SUA events in Tesla vehicles, I read each report made to NHTSA regarding Tesla vehicles and counted all stories involving unintended acceleration except for reports made from outside the United States. Although several drivers report more than one SUA event in their reports, and several others filed more than one report, I did not count more than one SUA report per vehicle. These numbers do not include reports of SUA from media or social media. I repeated this process for a control group of non-Tesla vehicles. The control group contains luxury sedans, SUVs, electric vehicles, and hybrid vehicles.

I have tried to ensure accuracy. Possible errors include under-counting reports or misclassifying reports, both with Tesla vehicles and control-group vehicles. Other errors may include typos and similar errors, as well as possible inaccuracies in the NHTSA information upon which this petition relies.

I have consistently applied a SUA definition of “the occurrence of any degree of acceleration that the driver did not purposely cause to occur”⁴ except where the cause was obviously unrelated (e.g. brakes failing to stop a vehicle from rolling downhill, or the Tesla autopilot speeding up without the driver taking any action or counter-action). I have not used the 1998 NHTSA definition of SUA as “unintended, unexpected, high-power acceleration from a stationary position or a very low initial speed accompanied by an apparent loss of braking effectiveness”⁵. The definition applied to “Sudden Unintended Acceleration” in this petition is consistent with what is also termed “Unintended Acceleration”⁶.

Many complaints to NHTSA and media and social media reports contain errors of spelling and grammar. Rather than note each error, I have left each note unchanged except when necessary to clarify. On those occasions I have used square brackets. All consumer, media, and social media reports in this petition are sourced to publicly accessible documents for the purpose of transparency.

Throughout this petition, I have added emphasis to original complaints **using bold text**.

All data is current as of September 14th, 2019.

⁴ Belt, Ronald. “An Electronic Cause for Sudden Unintended Acceleration” April 2012, Page 1. <https://www.autosafety.org/wp-content/uploads/import/Belt%20An%20Electronic%20Cause%20for%20Sudden%20Unintended%20Acceleration.pdf>

⁵ *Ibid* Page 1

⁶ Department of Transportation. “Technical Assessment of Toyota Electronic Throttle Control (ETC) Systems. February, 2011, Page vi, Footnote 1.

Media Reports of Tesla SUA Incidents

There are many SUA events which have not been reported to the NHTSA. This is evidenced by reports in the media that are not reflected in the NHTSA complaint database. Media coverage of the Tesla SUA problem has been limited to local news outlets and electric vehicle blogs, and is both difficult to quantify and unlikely to be responsible for a feedback loop of similar reports. This section discusses some of those events to provide qualitative information about the SUA problem. The fact patterns in the media accounts and the reports to NHTSA are strikingly similar.

The earliest Tesla SUA-related crash of which I can find a record involved a [REDACTED]-year-old woman accelerating through the wall of a busy restaurant while attempting to park⁷. The woman, who had several passengers in her car at the time, said the car suddenly accelerated on its own. Tesla said data from the car showed the driver to be at fault. No NHTSA report was ever filed. Electric vehicle blog *Inside EVs* wrote at the time, “the driver claimed to have applied the brake, but the Model S lurched forward instead. There’s never been an ‘unintended acceleration’ event linked to the Model S, so we have our doubts in regards to the driver’s claim.” The 2013 Tesla Model S would later garner eleven complaints for SUA events, the first just a few months after this event and the most recent in February 2019.

A crash leading to the death of an [REDACTED]-year-old man in Houston, TX, stands out among the SUA crashes that remain unreported to the NHTSA. In late December 2015, the man was preparing to drive a friend to a medical appointment. Instead the Tesla drove through the driver’s garage and into a neighbor’s swimming pool. Although his passenger was able to escape, **the driver of the Tesla vehicle drowned**.⁸ Contemporaneous local media coverage noted the bizarre circumstances surrounding this man’s death. “Something went wrong. She says she thinks he hit the gas instead of the brake, and the car went through the garage door down into the swimming pool,” recounts witness [REDACTED]. No complaint with NHTSA was ever filed, presumably because the victim’s friends and family imagined the victim to be at fault.

On February 15, 2015, a Tesla Model S in Issaquah, Washington, crashed through the wall of a US Bank.⁹ Komo News reported contemporaneously:

The Tesla driver, who has not been identified, was trying to use an ATM at the US

⁷ Media coverage from Electric Vehicle blog *Inside EV’s*:

[REDACTED]

⁸ Media coverage from Cathy Hernandez of KPRC2 Houston:

[REDACTED]

⁹ Media Coverage from Komo News:

[REDACTED]

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Bank on Gillman Road at about 9 a.m. when something went wrong and the car jumped the curb and crashed through a brick wall, according to Marty Martin with the Issaquah Police Department.

The description of this crash is consistent with the Tesla SUA patterns described in later pages. No report of this incident was ever filed with NHTSA.

Tesla has consistently failed to identify potential problems to the public, in some cases placing blame for SUA events on individual drivers. In May 2013, for example, a Model S owner crashed their vehicle in Thousand Oaks, California, due to SUA. Tesla blamed the driver for the crash, and the driver did not report the incident until 2015 when the **same vehicle crashed again due to unintended acceleration**.¹⁰

In August 2016 a Tesla Model S in South Florida unintentionally accelerated into a gym. The acceleration and resulting crash were caught on video.¹¹ Electric Vehicle blog *Electrek* reported contemporaneously on the event.

What is known for a fact based on video evidence is that on August 9, 2016, a Tesla Model S was parking in front of a gym in Lighthouse Point, Florida, and then suddenly accelerated and crashed into the front door.

No one was injured during the accident, but it was a near miss since someone entered the gym through the front door, which was destroyed, just seconds before the crash.

Electrek continues with their report, quoting the driver of the vehicle's husband, who said in a since-deleted social media post:

I have owned several Model S Tesla's and currently own 1 P85D and 1 P90D. Recently, my wife experienced a near fatal accident when she was slowly parking at her gym. The car violently exploded into full acceleration and could have easily killed people in the gym. I am amazed and wildly disappointed by the way Tesla has handled this and their complete unwillingness to even talk to me about it. Of course, they immediately blamed it on the driver and claimed their online computer tells them that. Of course, it is possible that there could have been driver error, but we do not feel that is what has occurred and wanted to have it looked further into.

¹⁰ NHTSA Complaints #10758893 and #10758908, covered further in section "2013 Tesla Model S" below.

¹¹ Electric vehicle blog *Electrek* wrote about this crash and has a video of the accident here: <https://electrek.co/2016/09/25/tesla-model-s-crashes-into-gym-driver-claims-autonomous-acceleration-tesla-says-drivers-fault/>

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

While this petition focuses on Tesla SUA events in the USA, the problem is not exclusive to this country.¹² At least one Chinese media outlet reported on a SUA-related crash¹³, which was partially translated to English and published by *Electrek*.¹⁴

When the reporter rushed to the scene in Qingpu District, the owner [REDACTED] had just been rescued ashore, and the gray Tesla was still lying in the river and was soaked in the water. [REDACTED] is still in shock, he told reporters: I was from the beginning stepping on the brakes, and the car suddenly rushed out of control! It turned out that [REDACTED] and his wife drove the car to school in the morning of the incident. After the delivery, they came to the Tesla Supercharger station to prepare for charging. According to [REDACTED], he kept driving very slowly, stepping on the brakes, but when he got there, the car was out of control.

Tesla drivers experiencing SUA have also shared their experiences via social media. While this petition does not focus on social media reports, one post serves as an illustrative example. On September 13, 2019 someone claiming to own a Tesla Model 3 uploaded a video to YouTube¹⁵ which was picked up by the blog *Inside EVs*¹⁶ and shared widely. The video appears to show a car attempting to park but instead losing control and accelerating into a house. The video is captioned, "Slow down to pull up to the driveway. The M3 [then] jerked forward into a wall. Have a ticket open with Tesla to pull if the acceleration was due to driver input."

Tesla responded to *Inside EVs* on the afternoon of September 16, 2019. The response was described in the following way in an Editor's Note:

Tesla has reached out to us to remind us that in every case they've investigated thus far, where a driver says the car accelerated on its own, they've found that not to be the case. In fact, the cars have always acted as they're supposed to, and if there was any sudden acceleration, it was attributed to something pushing on the pedal (likely a human foot.) The pedals have sensors, which can assure that this is the case. Chances are, as in all previous cases, this occurred due to driver error.¹⁷

¹² See Also NHTSA Complaint #10836289 filed February 15, 2016 from Hangzhou, China.

¹³ Baijiahao Baidu (Chinese language).

https://baijiahao.baidu.com/s?id=1627347489694861334&wfr=spider&for=pc&sa=vs_ob_realtime

¹⁴ Electric vehicle blog *Electrek* reported on this unintended acceleration event in China.

<https://electrek.co/2019/03/10/tesla-crash-river-claim-unintended-accelerated/>

¹⁵ "TeslaCam - sudden acceleration" YouTube, 9/13/2019 found here -

<https://www.youtube.com/watch?v=S62epvpsdx8>

¹⁶ "Did This Model 3 Accelerate On Its Own Right Into A Wall?", *Inside EVs* 9/16/2019 -

<https://insideevs.com/news/371106/video-tesla-model-3-unintended-acceleration/>

¹⁷ "Did This Model 3 Accelerate On Its Own Right Into A Wall?", *Inside EVs* 9/16/2019 -

<https://insideevs.com/news/371106/video-tesla-model-3-unintended-acceleration/>

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

The data on SUA frequency in Tesla vehicles suggests that driver error is unlikely to be the cause of these events. It is more likely that Tesla has data indicating their vehicles are particularly susceptible to SUA and chooses to not release it.

Recent SUA Media Reports

Two very recent SUA accidents featured in local media have not been reported to NHTSA and capture the essence of the SUA problem. The media reports below feature video of the accidents caused by Tesla SUA events, and indicate that Tesla's SUA problems have not stopped.

Model X Crashes While Parallel Parking, Mayagüez, Puerto Rico, August 2019

In early August 2019, a street camera in Mayagüez, Puerto Rico picked up footage of a Tesla Model X accelerating unintentionally while parking, hitting several vehicles and nearly running over two people. The duration of the event, in which the vehicle changes direction several times, makes it unlikely the driver had simply mixed up the pedals for a moment. The video evidence is strikingly similar to several of the below complaints made to NHTSA.

The text of the report has been translated from Spanish using Google Translate, and a link to the video and full text in Spanish can be found in the footnotes.¹⁸

Video shows uncontrolled Tesla vehicle in Mayagüez about to run over a person

On Saturday, August 10, 2019, a strange vehicular accident occurred on Calle de la Candelaria, former street McKinley, Mayagüez, in front of the bakery massa bakery. The driver of a Tesla Model X electric car was parking, when suddenly it sped up, initially impacting a pick-up truck.

The impressive images show that the Tesla vehicle was very close to causing injuries to a young woman who was getting off the white Toyota Tacoma on the passenger side. Then it was extremely close to running over a person on the opposite sidewalk. The car continued uncontrollably and in a circle, subsequently impacting a second vehicle.

The video shows that other vehicles that were passing were saved "by a hair" if they were also impacted, but even more surprising is that the uncontrolled Tesla literally passed inches from the person on the sidewalk. Fortunately, the pedestrian reacted by moving or stepping aside, avoiding being hit. **The driver claims that the electric Tesla vehicle suddenly accelerated (emphasis added).** No one was injured.

¹⁸ Video and original text of news article here:

<https://www.tunoticiapr.com/noticias-policiacas/1614660804--Video-muestra-veh%C3%ADculo-Tesla-des-controlado-en-Mayag%C3%BCez-a-punto-de-atropellar-a-una-persona->

Model 3 Crashes Into Home, San Jose, California, June 2019

[REDACTED] was returning from her work at Apple in early June, 2019 when her new Tesla Model 3 unexpectedly accelerated through her garage and into her kitchen. A local news report tells the story of this SUA event, which has not been reported to NHTSA.¹⁹ Home surveillance video shows the car slowly pulling into the driveway and then accelerating rapidly into the garage. Highlights of the report are transcribed below:

Anchor: Was it driver error or Tesla error? A lot of questions tonight as a San Jose woman says her new Tesla suddenly accelerated, plowing through the garage, another car, and into her kitchen. You can see that red Tesla at the bottom of your screen going right through and speeding up the driveway.

Reporter: She says she's only owned the car for a few days, and says she did not have it set to autopilot. She also says her airbags did not go off.

Supriya Gupta: I don't know what happened, they [Tesla] should find it out.

Neither of these Tesla SUA events appear to be in the NHTSA complaint database. These incidents may be under-reported.

Possible SUA Incidents in Media Reports

Many media reports cover Tesla crashes that may or may not be SUA events. Tesla has the relevant data and, in many cases, is the only entity able to determine the cause of a crash.

For example, a Tesla crash in Oslo, Norway reported by TV2 Norway²⁰ and an Oslo Police Twitter account²¹ on March 12, 2018, displays a fact pattern consistent with Tesla's larger SUA problem, but cannot be confirmed as such without data from Tesla. According to TV2 Norway and Oslo Police, the Tesla drove into and through the wall of a parking garage in downtown Oslo.

The contemporaneous tweets of Oslo Police²² note the "unexplained course of events" that caused the Tesla to drive into the wall.

The original TV2 Norway report, run through Google Translate, says:

¹⁹NBC Bay Area report here:

<https://www.nbcbayarea.com/on-air/as-seen-on/Tesla-Crashes-Into-San-Jose-Home-Bay-Area-2.html>

²⁰ TV2 crash report (Norwegian language) here: <https://www.tv2.no/nyheter/>

²¹ Police tweets (Norwegian language) here:

<https://twitter.com/oslopolitioips/status/973192985071570944?s=20>

²² *Ibid*, as translated by Twitter's "Translate Tweet" function.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Car drove through brick wall in parking garage - one died

A person has been confirmed dead after driving into a brick wall in Nydalen, Oslo, police report on Twitter.

Police reported just before 3pm on Monday afternoon about a traffic accident in Nydalsveien.

One person was transported to hospital with critical injuries soon after emergency services arrived.

About half an hour later, police were able to confirm that they died from the injuries.

- The only thing we know is that it is a car that has driven in, and partly through, a brick wall. It is unclear what speed the car had, but there is talk of major material damage, operations manager Gjermund Stokkli told TV 2.

As this petition shows, the majority of Tesla SUA-crash events reported to NHTSA happened while parking. Several dozen Tesla drivers have filed NHTSA reports claiming they unintentionally accelerated into the walls of parking garages, home garages, parking lot walls, building walls, and other objects while attempting to park their vehicles. While the causes of the incident in Norway and similarly unexplained crashes elsewhere²³ are unclear, Tesla has the data relevant to determining whether unreported events with similar fact patterns are SUA events.

Tesla Model X

2016 Tesla Model X

Of Tesla's three mass-produced vehicle models, the one with the highest rate of SUA complaints is the Tesla Model X. The 2016 Model X is the vehicle most prone to Sudden Unintended Acceleration in the data set, by a wide margin. 2016 Model X is the subject of sixteen NHTSA complaints²⁴. NHTSA's Early Warning Reporting (EWR) shows a population of 17,709 2016 Model X vehicles²⁵. With an approximate average age of three years per vehicle, the 2016 Tesla Model X has 53,127 car years. There have been 16 SUA reports relating to the

²³ *Desert Sun* reports a Tesla crashed into a building in El Paseo, CA.

https://www.desertsun.com/story/news/crime_courts/2016/02/27/tesla-crashes-into-el-paseo-salon/81035076/

²⁴ NHTSA SUA complaints for 2016 Tesla Model X: #10873117, #10893066, #10898260, #10908051, #10909588, #10910108, #10915633, #10935272, #10939234, #10957394, #10970822, #10995447, #11003716, #11083342, #11096621, #11118315

²⁵ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.

<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

2016 Tesla Model X, meaning this vehicle has **30 SUA reports per 100,000 car years**. To measure another way, 2016 Model X owners report **1 SUA incident per 1107 vehicles**.

In comparison, the 2015 Cadillac Escalade, the 2014 Ford Explorer, and the 2013 Lexus RX 350 each elicited SUA reports at a rate of less than 1 per 100,000 car years, meaning NHTSA is in receipt of more than **thirty times the number of SUA complaints for 2016 Tesla Model X than for the comparable vehicles** on a per-100,000 vehicle-years basis.

Table 1: 2016 Model X Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model X	2016	10873117	6/7/2016	Parking	California, Anaheim	1
Model X	2016	10893066	8/4/2016	Parking	Connecticut, Danbury	0
Model X	2016	10898260	8/24/2016	Parking	Florida, Ormond Beach	0
Model X	2016	10908051	9/19/2016	Parking	Massachusetts, Boston	0
Model X	2016	10909588	9/26/2016	Parking	Massachusetts, Lexington	0
Model X	2016	10910108	9/27/2016	Parking	Unknown	1
Model X	2016	10915633	10/12/2016	Parking	California, Santa Clara	0
Model X	2016	10935272	12/14/2016	Parking	New York, Amagansett	1
Model X	2016	10939234	1/3/2017	Parking	California, Santa Clara	0
Model X	2016	10957394	2/27/2017	Parking	Georgia, Marietta	1
Model X	2016	10970822	4/5/2017	Parking	California, Dublin	0
Model X	2016	10995447	6/16/2017	Parking	California, Cupertino	0
Model X	2016	11003716	7/7/2017	Parking	Texas, South Lake	2
Model X	2016	11083342	4/4/2018	Parking	California, Los Angeles	1
Model X	2016	11096621	5/17/2018	Parking	Massachusetts, Lynnfield	0
Model X	2016	11118315	8/7/2018	Driving	California, Rancho Palos Verdes	0

NHTSA Complaint #10995447 from Cupertino, CA, is a typical complaint and suggests that **Tesla knows their vehicles are particularly susceptible to SUA**. This Model X owner waited for seven months after the crash to file a complaint because **Tesla claimed the crash resulted from driver error**:

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Vehicle accelerated suddenly and crashed into a tree in front while parking the car in a parking lot. We reported the problem to Tesla but they got back to us denying any car malfunction that caused the acceleration.

NHTSA Complaint #10908051 from Boston, MA reports a similar Tesla response. After explaining how the 2016 Tesla Model X in question accelerated into a concrete pole in the owner's garage, the complaint notes (emphasis added):

At first Tesla told us over the phone that their logs show that the driver pressed the pedal 100% and then tapped the brake before impact. This explanation sounded physically impossible because the distance covered was less than 3 car lengths. A month later Tesla sent a letter stating the driver pressed the accelerator 100% until the vehicle sensed a crash. **Tesla did not respond to our query about why their log story had changed.**

A 2016 Tesla Model X customer in Ormond Beach, FL had a similar experience:

On July 8th 2016, at 9:37 A.M., while slowly pulling into a parking space at Creekwood Dog Park in Bradenton Florida, my Tesla Model X suddenly accelerated under its own volition, drove over a parking stop, over a five inch curb, and then hit and knocked over a concrete light pole. All this happened in a distance of less than twenty feet. Tesla was notified immediately and the car was taken to Dimmitt Collision Center in Clearwater, Florida. The service manager at Tesla of Tampa, told me verbally the log from the EDR says the car was traveling at 6 MPH, then the accelerator was advanced to over 50% and then to 87%. The car accelerated to 20 MPH and abruptly stopped. I denied this scenario and asked for a supervisor. Teslas Southeast Regional Manager met us at the body shop. He handed me a letter that had different EDR results-vehicle speed was 7 MPH, pedal position went from 3.2% to 15.6% to 100% and car went to 14 MPH. The first repair estimate showed actual mileage as 205 and a subsequent repair estimate shows the actual mileage as 1425. These figures are inaccurate since I had looked at the odometer several days before the accident and the mileage was over 1800. I informed Tesla that I am positive beyond a shadow of a doubt that the cars electronic throttle computer was responsible for the accident which they deny. This appears to be the industry standard since experts will testify that although a car is responsible for unintended acceleration there will be no traceable evidence of that responsibility and therefore the manufacturer has plausible deniability. Teslas are undergoing unintended acceleration at a rate more frequent than 1/5000 vehicles manufactured.

██████████ in Anaheim, CA was the first to report a Tesla Model X SUA crash to the NHTSA, filing complaint #10873117. He said:

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Our 5 day old Tesla X while entering a parking stall suddenly and unexpectedly accelerated at high speed on its own climbing over grass and crashed into a building. The airbags deployed and my wife's arms have burn marks as a consequence.

The crash was widely reported in the media. Tesla quickly responded with a statement claiming the vehicle data showed the driver to be at fault:

Data shows that the vehicle was traveling at 6 mph when the accelerator pedal was abruptly increased to 100 percent. Consistent with the driver's actions, the vehicle applied torque and accelerated as instructed.²⁶

Financial news magazine *Business Insider* summed up Tesla's response by concluding, "That indicates a more prosaic reason for the crash: The driver accidentally pressed down on the accelerator pedal... All the signs point to a much simpler explanation: driver error."²⁷

This response from Tesla is consistent across the above complaints, but is particularly similar to Tesla's response to the first Model S SUA crash in Ventura County, discussed in the "Media" section above. Tesla told both drivers (and the media) that the drivers had pressed on the accelerator when both drivers deny doing so. These two incidents mark the first SUA incidents, one for the Model S and the other for the Model X; both vehicles would be plagued by complaints of SUA events and crashes over time. Rather than address what appears to be a systemic problem, Tesla chose to blame the victim of the crash.

Tesla has continued blaming the victims of the alleged 2016 Model X SUA problem. In April 2017, NHTSA received complaint #10970822, another SUA-related crash report from a 2016 Tesla Model X owner in Dublin, CA (emphasis added):

I was in a parking lot waiting on a lunch order. After getting my order I was ready to pull the car out of my parking space. The car was stationary and not moving. As I step on the gas to pull out, the car went into 100% acceleration forward climb the curb and crash into a concrete wall that surround the garbage dumpster. The wall was about 3 to 5 feet from my parking space. **I contacted Tesla and was told I step on the gas 100% in under 2 second[s], and they would not claim responsibility.** As I tell them I am 100% sure I did not step on anything 100% (gas or break) when I am in a busy parking lot. **They still denied and said it was my fault.**

²⁶ As quoted here:

<https://www.extremetech.com/extreme/229755-another-tesla-low-speed-crash-another-set-of-theories>

²⁷ Here:

<https://www.businessinsider.com/tesla-denies-model-x-crashed-itself-into-wall-on-autopilot-puzant-ozbag-2016-6>

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Tesla received further pushback from a Lynnfield, MA, 2016 Model X customer who reported a SUA crash in early 2018. In complaint #11096621, the driver reports to the NHTSA (emphasis added):

While visiting a funeral home in Melrose, MA., I needed to back into a spot to be able to take part in a funeral procession. I pulled out of the spot I was in and proceeded to put the car in reverse to back into the same parking spot. At the same moment that I started to back in the car surged and made an arc in the parking lot only stopping after I hit a parked car with such force that it caused two more cars to be hit by the impact. I attempted to stop the car by stepping on the break which had no effect and even though I wasn't hurt, my arms ached for days because I was trying to control the wheel to no avail. I have a clean driving record and was in reverse at the time which meant I had my foot on the gas to back in slowly. **I have requested that Tesla check the computer to see if I am of fault or not and they have refused.** My Tesla is being repaired and I need to know if this was a technical error. I was told it could be the auto pilot system that could be a fault even though I have never used it. Please help because I am concerned that we should be aware of how this happened.

Most complaints are filed very quickly after the SUA events happen. While it is impossible for the public to determine the nature of Tesla's response to all of these events, the volume of data suggests Tesla must know it has a SUA problem. On August 4, 2016, the NHTSA received another report of SUA, # [REDACTED] from Danbury, CT:

While attempting to park, the vehicle **independently accelerated without warning and crashed** into a wood fence . . . The manufacturer was notified of the failure.

And another report in September, # [REDACTED] from Lexington, MA:

I was going up [my] driveway waiting for my garage door to open. I took my foot off the accelerator and was slowing down without hitting the breaks waiting for the garage door to open. The car took off through the garage door and hit my husbands car sitting in the garage.

The very next day, NHTSA received another Model X SUA-crash and injury complaint, #10910108:

While coming to a stop in a parking garage going 3 MPH the auto **suddenly projected forward at full speed into a concrete wall** destroying the entire front end of the car and injuring the passengers by deployment of the air bags.

And another report the next month, #10915633 from Santa Clara, CA:

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

While parking the vehicle, it accelerated while depressing the brake pedal **and crashed into a fence** . . . The manufacturer was notified of the failure.

The following month, November 2016, another 2016 Tesla Model X driver experienced a SUA crash in Santa Clara. Complaint #10939234 was filed with NHTSA in January 2017:

While turning left into a parking spot at a very slow speed, **the car suddenly accelerated with extreme force. It ran over a curb and collided with a tree and a truck.** There was only light pressure on the accelerator. The automatic braking and the airbags did not deploy. There was over \$18,000 damage to the two vehicles and the Tesla Model X is not driveable without repairs.

In December 2016 Tesla was still producing the 2016 Tesla Model X, and owners of these new cars continued reporting SUA problems. Complaint #10935272 from a Tesla Model X driver in Amagansett, NY:

I had pulled into a parking lot, proceeded to pull into a spot adjacent to a cinder block building. I had my foot lightly on the gas pedal, then as I made the turn into the spot, my foot was on the brake - the car lurched forward and sped up and the brakes did not stop it. It went right into the concrete building, head on - air bags deployed. The front end crushed and the 2 airbags on the drivers side deployed and were smoking. I read on line that there have been numerous incidences of this happening with the Tesla.

Spontaneous acceleration with my foot not on the gas pedal. The car would not stop by the brakes! I could have been seriously injured or hit another person or vehicle. The car hit the building as well as a natural gas pipe that was running along the buildings side at the level of my front bumper. I filed a police report.

The SUA claims did not stop in 2016. A Tesla Model X owner in Marietta, GA, notified NHTSA of a SUA crash and related injury in February 2017, complaint #10957394:

I drove my Tesla Model X 2016 today to work and when I was about to park the car in the parking lot (around 6 miles per hour may be) it suddenly accelerated and hit the concrete wall and bounced back around 8 feet. Since it was for parking I can surely say that I did not accelerate the car. . . I searched on line and there seems to be a class action suite on this issue but Tesla is not accepting it as the glitch in their software or some other component. I felt like the accelerator got pressed the way when the car was in cruise mode. Unless I wanted to hit the wall intentionally there was no need for me to press the accelerator to speed from almost zero to whatever the high speed it attained at the time of hitting the wall.

In July 2017, NHTSA received complaint #11003716, another SUA-crash and injury report from a 2016 Tesla Model X owner in Southlake, TX:

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

My Tesla Model X 2016 accelerated on its own after I come to a complete stop at a parking lot, **crashed into the front of the pediatrics building**. 2 injuries.

Complaint #11083342 from February 2018 warns NHTSA of another alleged SUA-caused injury accident in Los Angeles, CA.

I was driving my Tesla Model X EV home and there were no problems. When I pulled into the driveway the self driving features accelerated the vehicle causing an accident.

Nearly all Tesla Model X SUA reports note the driver was in the act of parking their car. One exception, complaint #11118315 from Rancho Palos Verdes, California, in August 2018, says simply:

The car auto accelerated on a surface street and crashed.

The sheer volume of SUA complaints about the 2016 Tesla Model X indicates the existence of an underlying, systemic problem with the vehicle. **Tesla must have known in real time these vehicles were experiencing SUA and related crashes at rates unprecedented in the auto manufacturing industry. If Tesla did not know, it likely should have known.** Both Tesla and Tesla customers acknowledge that Tesla has the data relevant to the cause of SUA events and has so far refused to share that data with their customers.

However, Tesla's Model X SUA problem is not limited to vehicles produced in 2016.

2017 Tesla Model X

The 2017 Tesla Model X is the subject of six NHTSA complaints.²⁸ NHTSA's Early Warning Reporting (EWR) shows a population of 17,138 2017 Model X vehicles.²⁹ With an approximate average age of two years per vehicle, the 2017 Tesla Model X has 34,276 car years. There have been 6 SUA reports relating to the 2017 Tesla Model X, meaning this vehicle has **17.5 SUA reports per 100,000 car years, or 1 SUA report per 2,857 vehicles.**

As a comparison, the 2015 Nissan Pathfinder has 91,823 vehicles on the road, and with an approximate age of four years per car, or 367,292 car years, I could find no SUA complaints on the NHTSA website.

The 2017 Chevrolet Bolt, with 26,686 total cars and an approximate age of two years per car (53,372 car years) has two SUA complaints, or 3.75 per 100,000 car years or 1 SUA report per

²⁸ NHTSA SUA complaints for 2017 Tesla Model X: #11073274, #11076619, #11083755, #11102931, #11112860, #11128789

²⁹ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

13,343 cars on the road. Meaning the 2017 Tesla Model X has more than 4.5 times the number of SUA complaints than the 2017 Chevrolet Bolt filed with NHTSA on an apples-to-apples basis. (However, the 2017 Chevrolet Bolt has a higher-than-average rate of SUA complaints relative to the control group as a whole.) **The 2017 Tesla Model X has a SUA complaint rate of more than 17 times the control group rate.**

Table 2: 2017 Model X Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model X	2017	11073274	2/16/2018	Parking	California, Arcadia	0
Model X	2017	11076619	3/7/2018	Parking	Arizona, Phoenix	0
Model X	2017	11083755	4/7/2018	Parking	California, San Jose	1
Model X	2017	11102931	6/21/2018	Parking	California, Concord	0
Model X	2017	11112860	7/21/2018	Parking	California, Danville	3
Model X	2017	11128789	9/11/2018	Parking	Utah, Lindon	0

On January 24, 2018, a 2017 Tesla Model X owner was in a school parking lot in Arcadia, CA, when their vehicle suddenly accelerated into a school building. The driver filed complaint #11073274 on February 16, 2018, and described the following:

While attempting to park the vehicle and apply the brakes at 5 MPH, the vehicle picked up speed. As a result of the failure, **the vehicle crashed into a school building** . . . The vehicle was towed to an independent mechanic who determined that the accelerator pedal was depressed to cause the collision. . . The approximate failure mileage was 800.

On March 7, 2018, a 2017 Tesla Model X driver in Phoenix, AZ, filed complaint #11076619 with the NHTSA: “I was parking when I felt the vehicle suddenly accelerate and jump the curb, smashing through the front windows/door of a business.”

One month later in San Jose, CA, it was the driver of another 2017 Tesla Model X who crashed due to unintended acceleration. Complaint #11083755 says:

My car had an unintended acceleration when I was trying to park in the parking lot of my office. The car accelerated, jumped the parking curb and hit another parked car. My car suffered substantial damage, air bags were deployed and I escaped with minor bruises. The car which I collided with was parked and did not have any passengers in it. Nobody else was injured.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

One month after that, in May 2018, another 2017 Tesla Model X experienced SUA and crashed into a supermarket in Concord, CA. In their NHTSA complaint #11102931 dated June 21, 2018, the driver says:

I was slowly moving into a parking space in front of a supermarket when the car suddenly accelerated, **hit the concrete parking space block in the front of the parking space, jumped the curb, and glanced off the corner of the supermarket building before turning 90 degrees and stopping.** The entire incident literally took seconds. All the airbags deployed, and the insurance company has totaled the car. The accident was caught on the supermarket's surveillance cameras.

Two weeks after the above incident, another 2017 Tesla Model X driver in nearby Danville, California, experienced a similar SUA event which injured three people. In complaint #11112860 the driver says:

The car suddenly took over and accelerated beyond control while I pulled the car into a parking space. Front airbags were deployed and the front end of the car was damaged beyond repair. The car was totaled.

In August of 2018 another Tesla Model X driver in Ventura, California, experienced a SUA crash while on the way to a medical appointment. In complaint #11128789 filed on September 11, 2018 from Lindon, Utah, the driver states:

On August 4, 2018, in Ventura, CA, at about 2:30 PM I was driving a passenger to a medical clinic in a rented Tesla Model X. As I was pulling into the parking space the Tesla rapidly accelerated forward unexpectedly. Surprised and scared I turned the steering wheel as hard as I could and pressed on the brake to stop the car to avoid the building in front of me. Even with my efforts of stopping, the car went over the curb onto the sidewalk and then over a low cement wall and finally stopped next to the building. This caused damage to the cement wall, the front right wheel well and the undercarriage of the car. Luckily no one was hurt. If I hadn't avoided hitting the building or if a person had been walking or standing in front of me on the sidewalk someone could have easily been injured. The police were called and there was an incident report.

Despite the relatively high number of 2017 Model X SUA events, approximately 17 times the control group average on a per 100,000 car-years basis, the 2017 model-year is the least likely to be reported for SUA of the three full model-years (2016 - 2018), which indicates the severity of the SUA problem with the Model X.

2018 Tesla Model X

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

The 2018 Model X is the subject of five NHTSA complaints.³⁰ NHTSA's Early Warning Reporting (EWR) shows a population of 23,622 2018 Tesla Model X vehicles made for the US market.³¹

With an approximate average age of one year per vehicle, the 201 Tesla Model X has roughly the same number of vehicle-years as vehicles produced, or 23,622 vehicle-years. There have been 5 SUA reports relating to the 2018 Tesla Model X, meaning this vehicle has **21 SUA reports per 100,000 car years, or 1 SUA report per 4,725 vehicles.**

As a comparison, the 2018 Toyota Camry HEV has 27,493 vehicles on the road, and with an approximate age of one year per car, or 27,493 vehicle-years. This vehicle is comparable to the 2018 Tesla Model X in both age and total production number for the US market. However, I could find no SUA complaints on the NHTSA website for the 2018 Toyota Camry HEV. The 2018 Tesla Model X has a SUA rate approximately 21 times higher than the control group as a whole.

A full 25% of the total number of owner-complaints about the 2018 Tesla Model X on the NHTSA website involve SUA.

Table 3: 2018 Model X Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model X	2018	11092528	5/8/2018	Parking	California, Tustin	1
Model X	2018	11111431	7/15/2018	Parking	Washington, Seattle	0
Model X	2018	11142282	10/23/2018	Parking	Florida, Tampa	0
Model X	2018	11154380	11/27/2018	Driving	California, San Clemente	1
Model X	2018	11183334	3/1/2019	Parking	California, Pleasanton	0

On May 8, 2018, NHTSA received complaint #11092528 from Tustin, California, detailing a SUA crash which led to injury. The complaint says:

While pulling into a parking space, the brake pedal was depressed but the vehicle **inadvertently accelerated over a curb before crashing into a cement light pole.** The front end of the vehicle was severely damaged, and the air bags did not deploy. The driver sustained neck, shoulder, and chest injuries that required medical attention. A police report was filed. The vehicle was towed to a tow yard. On several occasions, prior to the failure, an erroneous warning message displayed while driving, indicating that the

³⁰ NHTSA SUA complaints for 2018 Tesla Model X: #11092528, #11111431, #11142282, #11154380, #11183334

³¹ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

vehicle was driving too closely to the preceding vehicle, even though another vehicle was nowhere in the vicinity. The contact indicated that the failure occurred on multiple occasions, including shortly before the crash. The manufacturer was notified of the failures. . . The failure mileage was 1,500.

On July 15, another report arrived, complaint #11111431 from Seattle, Washington. The complaint says:

When slowly pulling into a parking spot, **the car accelerated on its own jumping the curb and slammed into a chain link fence.** I pressed the brake pedal but it didn't respond. My ten year old child was in the back seat and thankfully we are both unharmed. **This is the second incident of the car accelerating on its own.** The first time this occurred was during my first week with the car and when I was slowly driving around a traffic circle in a residential area and the car took off on its own. No damage other than misalignment that time but **I was very scared and called Tesla service. It took several weeks for them to respond with the data report from the car and said that the vehicle increased speed due to the driver pressing the accelerator. I accepted their explanation and assumed that I was indeed at fault even though I was positive that I didn't press the accelerator. Im incredibly saddened by this situation as I truly loved this car but Im too frightened to drive it again.** Its currently at a body shop.

In October 2018 in a Tampa, Florida, parking lot, another driver had an unintended acceleration event, described in complaint #11142282. The driver reports:

While in a parking lot at low speed and coming around a turn to park, Tesla suddenly accelerated from low speed to high speed hitting a pole. Airbags deployed. Sudden acceleration was without warning. Severe damage to car. Luckily no pedestrians nearby.

The next month in San Clemente, California, another 2018 Tesla Model X driver reported a similar event, resulting in an injury. In complaint #11154380 the driver tells the NHTSA (emphasis added):

On Nov 17, 2018 at 4:50 pm, I was driving my Tesla X slowly with auto pilot off and auto steer off on a surface street in San Clemente, CA. I was trying to do a U Turn. I verified that there was no traffic, that there was an area where cars were not parked on the left side of the street and could use a parking driveway on the right that will allow more space to perform the U Turn. I gently pressed the break to further slowdown and then veered a little to the right into the driveway at less than 5 MPH. I started to turn to the left while still gently pressing the break. As soon as the front right wheel left the driveway and before I had completed the U Turn, the Tesla all of a sudden, on its own spontaneously accelerated to full power (a Tesla X can go from 0-60 miles in approx. 4 seconds). My foot was still on the break, I did not move it and therefore I did not press

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

the accelerator. There were no objects obstructing the pedals. In a small fraction of a second, the Tesla traveled at full speed towards the Tacoma car parked ahead on the left (less than 20 feet). Something in the Tesla system triggered the sudden spontaneous full acceleration resulting in this collision. The Tesla had major damage in the front, the air bags were deployed. I had a major bruise on my abdomen and several small bruises on my chest. The Tacoma suffered damage in the front, moved backwards and hit the car parked behind it. There were no passengers in the other vehicles. **It is my firm belief that this accident occurred due not to a drivers error but to a technological error within the Tesla vehicle. I found more than 60 complaints for spontaneous sudden acceleration for Tesla vehicles that have been filed to NHTSA. What these complaints have in common are that vehicles are traveling slowly trying to park or make turns at low speed when sudden spontaneous full acceleration was triggered.**

In February of 2019 another 2018 Tesla Model X accelerated spontaneously, this time through the owner's garage and into the kitchen. As the owner recounts in their March 1, 2019 complaint #11183334 to the NHTSA:

Was parking my 2018 Model X on Feb 1, 2019, in my driveway. **The vehicle suddenly accelerated, hit the garage door(closed. No warning from sensor), went through garage door(vehicle did not stop after hitting the garage door), did not sense things(like washer, dryer, water heater, wall to my kitchen) in the garage door and finally smashed the washer/dryer before coming to a stop. Washer/dryer hit the wall and damage the entire kitchen.** No airbags came out. My wife was in the front seat, my daughter was in the backseat and my son was inside the home when it happened.

All three full-year production model-years of the Tesla Model X have a SUA complaint rate more than twelve times higher than the control group rate, and have the highest rates of Sudden Unintended Acceleration among Tesla vehicles. I believe I have provided enough information to warrant further investigation and recall by the National Highway Transportation Safety Administration of the 2016, 2017, and 2018 Tesla Model X.

However the Model X is not the only Tesla vehicle with Sudden Unintended Acceleration rates many multiples higher than the average car.

Tesla Model S

The Model S was the first of Tesla's mass-produced vehicles, and remains the flagship vehicle of the company. The car may be different from the Model X discussed above, but the SUA problems remain the same. Drivers report these vehicles have SUA events at many times the rate of other vehicles, and Tesla must know of the SUA problem as the company has all the

vehicle data. Many of the reports below specifically state that Tesla has blamed the driver for the crash yet refused to share vehicle data or to look for a structural problem with the car.

2013 Tesla Model S

The Model S began production in 2012 with a run of fewer than 3000 vehicles in that year.³² NHTSA has no record of any SUA complaints regarding the 2012 Tesla Model S, although the March, 2013 crash of a Model S into a Ventura restaurant (discussed in the “Media” section above) may be an example of one.³³

The 2013 Model S has a sample size of 17,833 vehicles produced for US consumers, according to NHTSA’s Early Warning Reporting.³⁴ With an approximate average age per car of six years, this vehicle can claim 106,998 vehicle-years, and twelve NHTSA SUA complaints.³⁵³⁶ The 2013 Tesla Model S has a SUA complaint rate of just more than **11 per 100,000 car years**, or **1 SUA incident per 1486 vehicles**. The 2013 Nissan Leaf, by comparison, has a SUA complaint rate of under 2 reports per 100,000 vehicle-years.

Table 4: 2013 Model S Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2013	10545230 & 10725634	9/24/2013	Parking	California, San Diego	0
Model S	2013	10545488	9/26/2013	Parking	California, Laguna Hills	0
Model S	2013	10562266	1/30/2014	Driving	New Jersey, Cinnaminson	0
Model S	2013	10749575	8/18/2015	Parking	California, Rancho Santa Fe	0

³² Using NHTSA’s EWR website, search for “Manufacturer: Tesla, Inc.”, “Report Type: Light Vehicle Production”, “Reporting Period: Year: 2019, Quarter: 1” to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

³³ Reported here by the *Inside EVs* blog here:
<https://insideevs.com/news/317464/tesla-model-s-crashes-through-restaurant-driver-blames-it-on-unintended-acceleration/>

³⁴ Using NHTSA’s EWR website, search for “Manufacturer: Tesla, Inc.”, “Report Type: Light Vehicle Production”, “Reporting Period: Year: 2019, Quarter: 1” to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

³⁵ Note there are fourteen complaints involving twelve vehicles, the total vehicle count is reflected here.

³⁶ NHTSA SUA complaints for 2013 Tesla Model S: #10545230, #10545488, #10562266, #10725634, #10749575, #10758893, #10758908, #10839579, #10958834, #11065308, #11081382, #11082114, #11156706, #11180431

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model S	2013	10758893 & 10758908	8/24/2015	Parking	California, Thousand Oaks	0
Model S	2013	10839579	3/2/2016	Parking	California, Pleasanton	0
Model S	2013	10958834	3/6/2017	Parking	California, San Jose	0
Model S	2013	11065308	1/26/2018	Parking	Texas, San Antonio	0
Model S	2013	11081382	3/26/2018	Stationary	Oregon, McMinnville	0
Model S	2013	11082114	3/30/2018	Parking	California, San Ramon	0
Model S	2013	11156706	12/7/2018	Stopped at Stop Sign	California, Milpitas	0
Model S	2013	11180431	2/15/2019	Parking	Colorado, Castle Rock	1

The first SUA complaint involving a Model S, or a Tesla vehicle of any kind, arrived on September 24th, 2013 from San Diego, California. The second arrived two days later, from Laguna Hills, California.

The first, NHTSA complaint #10545230 from San Diego, says:

The car was going at about 5 MPH going down a short residential driveway. Brake was constantly applied. The car suddenly accelerated. It hit a curb and the middle portion of the car landed on a 4.5 ft high vertical retaining wall. The wall is one foot away from the curb. The front portion of the car was hanging up in the air. The car was at about 45 degree up and 20 degree tilted toward the right side. An engineer from Tesla said the record showed the accelerating pedal was stepped on and it accelerated from 18% to 100% in split second. **He blamed my wife stepping on the accelerating pedal.** But he also said there was a built-in safe-guard that the accelerator could not go beyond 92%. The statements are contradictory. If there is a safeguard that the accelerator cannot go beyond 92%, there would be no way that my wife could step on it 100%. There were some mechanical problem that caused the accelerator to accelerate on its own from 18% to 100% in split second.

The above Tesla-owner wrote back to the NHTSA in June 2015, saying in complaint #10725634:

I previously filed a complaint to NHTSA on 9/24/2013 with NHTSA ID No. 10545230. I noticed similar issue was reported by 3 or 4 other Tesla owners: (1) 9/26/2013 NHTSA ID NO. 10545488, (2) 9/29/2014 NHTSA ID NO. 10639849, (3) 9/29/2014 NHTSA NO. 10639935, and (4) 6/8/2015 NHTSA ID NO. 10723925. There was another similar case in Camarillo CA as reported by Ventura County Star on 3/29/2013 but apparently was not reported to NHTSA. There were so many similar incidences happened with only a

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

limited number of 2013 and 2014 Tesla Model S on the road, something is not right with the Model S. **Tesla cannot keep blaming the drivers being at fault.**

Two days after the above Tesla owner's initial complaint, another SUA complaint arrived. NHTSA complaint #10545488 from a 2013 Tesla Model S owner in Laguna Hills, California, describes a crash which had taken place in July 2013:

I was at a full stop waiting to turn left into the parking garage. When it was clear of oncoming traffic for me to make the left turn, I released my foot off the brake pedal and the car instantly surged forward very fast and hit another vehicle parked in the front of the garage. This all happened so quickly that I did not have time to avoid the impact. The time of occurrence was in broad daylight at about 6pm PST.

I have driven this car for almost 10000 miles prior to the accident and know how to handle the car and understand the torque this car has. I have made thousands upon thousands of stops and starts with this vehicle **and this is the first time this has ever happened. There is no other term to describe this other than sudden acceleration.**

The local police department dispatched an officer and no drugs or alcohol was involved.

Tesla instructed their staff to not communicate with me about this accident.

In a January 2014 complaint, #10562266, a Model S driver in Cinnaminson, New Jersey, made a report to the NHTSA which was summarized as:

The contact owns a 2013 Tesla S 985. The contact stated that he was experiencing several failures with the vehicle. There were various shifting issues when using reverse. In addition, unintended acceleration occurred only when driving in extremely cold temperatures. The vehicle was taken to an authorized dealer where the computer system was reprogrammed but the failures recurred. The vehicle was not repaired. The approximate failure mileage was 200.

In August 2015 another complaint arrived with the NHTSA, #10749575 from Rancho Santa Fe, California.

The contact owns a 2013 Tesla Model S. **The contact stated that the vehicle suddenly accelerated without warning to its maximum acceleration rate and crashed into five parked vehicles.** The driver side of the vehicle was damaged and the air bags did not deploy. There were no injuries. A police report was filed. The vehicle was towed away by AAA. **The manufacturer was notified but was unable to advise the contact of the cause of the failure.** The failure mileage was 9,021.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

A second 2013 Tesla Model S SUA complaint arrived in August 2015. NHTSA complaint #10758893 says:

On July 16, 2015 while driving my 2013 Model S 60, I made a right hand turn into a parking space in Simi Valley, California. **As I pulled into the space, I took my foot off the accelerator and applied the breaks. Instead of stopping, the car lurched forward over a curb and a berm, stopping when it hit a fire hydrant,** propelling it off of its bolts, generating a huge geyser of water.

Because of the tremendous amount of water gushing over my car, I had no visibility and elected to stay in the car while attempting to dial 911. Moments later, a man who had been sitting in the car next to the space where I was attempting to park, opened the back door to ask about my condition. I then exited the car.

I was not injured and thank goodness the car had not hit another person or another car. It took a tow truck about 15 minutes to arrive at the scene. All the while the torrential water surged around, under and over my car and now flooded the interior. According to Tesla, either the car shorted-out causing all of the windows to roll down or there is a safety feature that causes the windows to roll down if the car perceives it is under water.

The man who braved the flood of water from the fire hydrant to check on me saw the entire accident as he was sitting in his car. He said that my break lights were on as my car went over the berm. I have no idea what caused the car to accelerate by itself and **I am certain that my foot was on the break pedal.**

The next day, I heard from both my insurance company and the body shop that Tesla wanted the car at their service center in Van Nuys. Several weeks ago, the claims adjuster called to say that due to the heavy water damage, the car has been "totaled".

I am writing this complaint on the NHTSA's website because I believe there is something terribly wrong with this particular car. Also, see NHTSA report of previous 2013 accident.

The same 2013 Tesla Model S driver had previously suffered a SUA-caused crash in their Model S. Perhaps thinking they had been at fault for the accident, they never reported to NHTSA until after crashing for a second time. They report to the NHTSA in complaint #10758908 the following:

This accident report is a previous accident involving the same 2013 Tesla Model S 60 as reported in the NHTSA report filed on August 24, 2015.

On May 7, 2013 while driving my 2013 Model S 60, I pulled into a parking space in Thousand Oaks, California making a left turn into the spot. As I pulled in, **I let my foot off of the accelerator, and applied the break. The car lurched forward, jumping a**

parking block, then over a curb, and finally into a cement light post. The airbags deployed and I was stunned.

I immediately called Tesla who sent a qualified Tesla tow truck. It took two hours to get the car onto a flat-bed truck because the car lost all power and shut down. It had to be dragged over two parking blocks, sustaining even more damage. Tesla sent the car directly to the body shop. **I insisted that they run a diagnostic test because I was (and still am) certain that the car accelerated on its own.** The Van Nuys service center rep said that the car had to be repaired first before any diagnostic test could be run. After three weeks I received a letter from Tesla. The engineers reported to me that the accelerator was depressed to 48%, seconds before the accident and 98.4% at the time of impact. **I still believe that the car accelerated by itself.**

It is my sincere hope that by reporting this accident (and the subsequent accident on July 16, 2015) further investigations can be conducted before people are seriously injured or worse. My insurance company (Farmers) does not intend to investigate. It is less expensive for them to pay for a replacement value than to determine the true cause of this incident. Fortunately, you and your agency aspire to a higher purpose.

On March 2, 2016, NHTSA received complaint #10839579 from Pleasanton, California, from a Tesla Model S driver who also experienced two SUA events. In their words:

Slowly pulling into a parking spot at a strip mall, I released my foot off of the gas, lightly tapped brake and the car “unintentionally accelerated” into a palm tree in front of a brick pillar at a strip mall. I backed out to assess the damage. Husband was witness in driver’s seat. **This is the 2nd time this happened to me,** (last year at a grocery store parking lot) altho the first time no damage was done and no reports were filed. Poor decision in hindsight! Since no person was injured, the Police Dept would not take a report. Insurance was called as well as Tesla. Tesla took 6 days to pull logs and assured us it was being taken seriously and escalated to management. We received a call yesterday from Tosha at Tesla, relaying that **they determined that [it] was driver error** and log reports show that as the car was pulling into the spot, it was on a 3 on a scale of 100 and then it accelerated 87% and the brake was applied. Does not make logical sense that the car could accelerate 87% in a matter of 2 feet! **I am 150% sure I did not hit the accelerator.** I am [redacted] not a [redacted] yr old woman who may have pedal confusion. **This has never happened with any of our other non-Tesla cars** nor in my 40+ years of driving cars or motorcycles. **Their response is suspect and we are quite frankly fearful to drive the car safely.** This strip mall has lots of people that walk by, esp elderly and the fact that no one or the pillar was hit is a blessing. Air bags did not deploy. I will be asking Tesla for a written report of their findings but not confident it will be provided. We plan to seek counsel as well esp since this is considered an “at fault accident”.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

On March 6, 2017, NHTSA received another 2013 Tesla Model S SUA complaint, #10958834, this one from San Jose, California, which reads as follows:

The driver of our car was parking our Tesla Model S P85+ and slowly moving into the parking spot nearing the final distance in to the spot, **when the car suddenly lurched forward, hitting and knocking down a light pole.** The driver did not cause this acceleration to occur and was quite surprised to have this happen.

There were no injuries involved in the incident, but a light pole located 1.5 feet [away] from end of the parking spot was knocked down and we have minimal damage to the front of the vehicle.

And more complaints were forthcoming. In January 2018 a driver in San Antonio, Texas, reported a SUA accident while parking in complaint #11065308, which says:

Driver stopped car while pulling into garage with rear wheels on driveway sloping down and away from garage and front wheels just inside garage. Vehicles creep mode in off position. Car at rest. Brake released, and vehicle began rolling backward due to gravity. Accelerator applied, an no initial response, car continued to accelerate backward roll speed, so pedal depressed further (Tesla vehicle logs show 25-50% pedal travel at this point), at which time drive unit quickly engaged at 25-50% of full acceleration resulting in a sudden unintentional forward acceleration. Driver caught by surprise and attempted braking. Unfortunately, vehicle impacted freezer unit in garage destroying the freezer and causing significant vehicle structural damage. This set of operating parameters was reproducible and reliably resulted in a short, but notable, delay in pedal response when rolling backward, resulting in further pedal depression, then followed by a sudden acceleration forward, which was short, but, with the potential to be significant when collision hazards exist nearby. The vehicle operating manual contains no warning regarding this situation. Tesla was made aware and would only comment that the vehicle did not malfunction. While that may be the case, the vehicle design sets up drivers for accidents that might result in injury and property damage when drivers are not warned of the vehicle's response in this unique operating circumstance. At the very least, it seems, Tesla should include a warning to drivers about this situation so that drivers might be ready for sudden accelerations in such instances, or drivers might simply select creep mode on in such situations, which would prevent the sudden acceleration.

On March 26, 2018, another SUA complaint against the 2013 Tesla Model S arrived, this time from McMinnville, Oregon. NHTSA complaint #11081382 reads:

The contact owned a 2013 Tesla Model S. The contact stated that while stationary with the brake pedal depressed, **the vehicle independently accelerated rapidly without warning and crashed into a wall.** . . The manufacturer was made aware of the failure. The failure mileage was 40,000.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

NHTSA Complaint #11082114 followed four days later from San Ramon, California.

Sudden Unintended Acceleration Tesla. I drove my Tesla from work, driving over 35 miles during rush hour of the bay area. When I entered my subdivision, I was driving at 10 MPH, pulled into my driveway made 90 degrees turn at 5 MPH, applied the brakes. **Instead of stopping, car sped up at extremely high acceleration.** It drove through the garage door, hit Maserati parked in the garage, and a motorcycle parked next to it. The Maserati trunk was pushed in approx 3 feet, it slid sideways, hit the pillar, smashing driver door and window, slid to the front and hit the motorbike parked next to it. It completely smashed the rear truck, front and side of the Maserati. It smashed the front end of the motorcycle. There were fluids [from] Tesla, Maserati, and bike all over the garage. We thought the fuel tank in Maserati broke. We had to call 911, dozens of personnel showed up including several fire trucks, police cars, ambulance, hazmat among others. They spend over three hours controlling the situation. They had to cut the garage door to pull out the Maserati and Tesla. It was towed to a storage facility nearby. Maserati was declared a total loss. I was completely shaken and have not been able to sleep at all for last three days. What if my kids had been playing in the driveway or in front of the house. After doing some research I found this is not a random instance. There are dozens if not hundreds of similar incidents wherein, when a driver makes a sharp turn into a driveway or garage and applies the brake, rather than slowing down car just decides to speed up like a bullet and goes through the walls or whatever comes its way. I have stopped driving for the foreseeable future, I am not going to put my step in another Tesla for my safety and safety of others. Stay away from this unproven technology for your/others[.]

In December 2018 NHTSA received complaint #11156706 from Milpitas, California:

I was driving my Tesla Model S early in the morning in a quiet neighborhood when [I] was slowly approaching [a] four-way stop sign intersection by gradually step on the brake. **At the very beginning, I can feel the car decelerated, suddenly there was unintended acceleration that I felt.** There was a jerking forward of the car, so I was not able to make a full stop at the stop sign. Then the speed drops down significantly, almost to zero. I pressed the flashing light because there was a line of cars behind me and I was in the middle of the road. The car was in almost zero speed, so I tried to move the car to the side of the road and pressed the acceleration pedal a little. The car didn't accelerate, instead, it turned into a stop situation. I realized I lost driving power of this car. I pressed the "P" button, then all four mode letter "P", "N", "R", "D" turned red, [blinking]. The car stopped close to the curb but partially in the middle of the road. I was able to get out of the car and called Tesla Roadside Assistance. They checked some log and responded with towing service to send the car to the service center. The overall situation could have turned very severe safety issues if ever this happened on the highway, or there was human being walking across the street while I was not able to fully

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

stop the car, neither control it. I am waiting for official service report but the car is confirmed not in drivable condition. And I feel extremely unsafe to drive it now and even not comfortable to drive it after what just happened this morning. The entire drive unit was maintained and changed to a new one in 2015, so its life only about 3 years in this car. Plus, I just had the car service at the Tesla service center month ago. It is worrisome they can't even prevent such issue and detect it in an early stage, perhaps a design issue to address?

The final complaint to date involving 2013 Tesla Model S SUA came February 15, 2019, and reports an injury accident in Castle Rock, Colorado. Complaint #11180431 says:

It was a 2hr45min drive into work on an icy blizzard morning, driving my 2013 Model S RWD P85 with 90,000mi. Have owned this car for 4 yrs. Made it to work safely and the last 6 feet in the parking garage, going about 3 MPH pulling at a right angle into a parking stall. Had brake pedal depressed, shifted my foot to tap on the accelerator to inch forward and next thing you know, **car is accelerating full throttle into a cement wall**. Crashed head on an airbag didn't even deploy. Sat for a moment to catch my breath and try to process what happened. Sent "bug report" on to Tesla Central from the car. The dashboard had PRND lit up in red and the vehicle would not go into drive or reverse. Accelerator pedal was completely limp. Zero resistance. Thankfully, no other car was around me. Called Tesla Service and they told us to reboot the car. We did, but accelerator pedal remained completely unresponsive. Had to push out of the 5 story garage and tow it to an autobody shop. Filed police report. Reported to local Tesla Service Center immediately. A few days later, we heard back from the Tesla Rep that said that report showed no malfunction. According to Tesla accelerator went from 0% to 88% suddenly, implying "**driver error.**" Yet they also said the brake was tapped and then released prior to impact. This does not jive, why [would] a person accelerate, tap the brake, then release? Skid marks from rear tires left on garage floor. **Tesla won't release data. We do not want to accept this report and this is not what happened during the crash.** Today the auto body shop informed us that they were curious why the car is not driveable. After being reset, they discovered the accelerator pedal is broken. Experience during the crash, combined with very unusual car behavior, and a broken accelerator refute Tesla's claim of operator error.

The number of occurrences of markedly similar problems indicates an underlying problem of which Tesla must be fully aware. However these SUA problems with the Tesla Model S are not limited to the 2013 model-year. SUA problems plague the Model S in model-years 2014, 2015, 2016, 2016, and 2018. As spelled out in the following pages.

2014 Tesla Model S

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

The 2014 Tesla Model S is the subject of five NHTSA SUA complaints.³⁷ According to NHTSA statistics, this is the safest vehicle in Tesla's fleet in terms of SUA.³⁸ NHTSA's Early Warning Reporting (EWR) shows a population of 17,867 2014 Tesla Model S vehicles made for the US consumer.³⁹

With an approximate average age of five years per vehicle, the 2014 Tesla Model S has approximately 89,335 vehicle-years. There have been 5 SUA reports relating to the 2014 Tesla Model S, meaning this vehicle has **more than 5 SUA reports per 100,000 car years, or 1 SUA report per 3,574 vehicles.**

As a comparison, the 2014 Mercedes-Benz E-Class has 82,118 vehicles on the road, and with an approximate age of one year per car, or 410,590 vehicle-years. This vehicle is comparable to the 2014 Tesla Model S as both are luxury sedans of the same year. However, the 2014 Mercedes-Benz E-Class had only two complaints of SUA in more than 400,000 vehicle-years, and a total SUA complaint rate of less than 0.5 per 100,000 car-years. The 2014 Tesla Model S, with 5.5 SUA reports per 100,000 car-years, has a much higher SUA complaint rate.

Table 5: 2014 Model S Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2014	10639935 & 10639849	9/29/2014	Parking	California, Bakersfield	1
Model S	2014	10723925	5/22/2015	Red Light	Florida, Gainesville	1
Model S	2014	10845619	3/8/2016	Red Light	California, Silverado	0
Model S	2014	10982961	5/1/2017	Parking	Florida, West Palm Beach	1
Model S	2014	11139174	10/9/2018	Parking	Washington, Kirkland	0

The first of the 2014 Tesla Model S SUA complaints arrived from Bakersfield in September 2014 regarding an injury SUA crash from July 2014. Complaint #10639935 to the NHTSA says:

I pulled slowly in to a parking spot & my car was at a stop position just ready to push park button. Within a split second, my car (Tesla) jumped the curb and traveled 5' of

³⁷ NHTSA SUA complaints for 2014 Tesla Model S: #10639935, #10639849, #10723925, #10845619 #10982961, #11139174

³⁸ Not including the Tesla Roadster, which had minimal production and for which statistics were not considered for this report.

³⁹ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

sidewalk breaking a glass wall & **traveling through a restaurant breaking tables & chairs within couple of seconds w/o me accelerating the pedal.** Brake pedal was applied by me half way through the restaurant before the car stopped. No serious injuries to anyone. Tesla was notified & this is the log file data word by word from them.

?At the time of the incident that resulted in damage to your vehicle, you increased the accelerator pedal position from 1% to 50% in less than one second without depressing the brake pedal. One second later, you increased the accelerator pedal to 100% without depressing the brake pedal. One second later, you continued depressing the accelerator pedal at 100% without depressing the pedal; however, the vehicle's traction control engaged & therefore limited the vehicle's torque despite the fact you were depressing the accelerator pedal at 100% until you depressed the brake pedal in the following second?

Insufficient information provided by Tesla. How much was the accelerator pedal depressed? Speed of the car? Distance travel? How does this prove that this is not sudden acceleration? The log does prove that I was at a stop. My car will be totaled but is still sitting at storage with insurance company for a short period of time. Many accidents with Tesla has occurred, even just like mine in to a restaurant (<https://insideevs.com/news/317464/tesla-model-s-crashes-through-restaurant-driver-blames-it-on-unintended-acceleration/>) (https://www.motorauthority.com/news/1087171_tesla-model-s-unintended-acceleration-complaint-filed-with-nhtsa) **They can't all be drivers fault. NHTSA needs to investigate the box in the car before fatal injuries occur. Public safety should be the priority.**

The driver followed up with a second report to the NHTSA on the same day, summarized in complaint #10639849 as follows:

The contact owns a 2014 Tesla Model S. While pulling into a parking space, the vehicle **surged forward, jumped the curb, and crashed into a building.** A police report was filed. There were no injuries. The vehicle was towed to an impound lot. The manufacturer was notified of the failure. The approximate failure mileage was 1,200.

The NHTSA received complaints #10723925 from Gainesville, Florida, in June 2015. The driver alleges SUA while coming to a stop light.

Seeing the vehicles a considerable distance ahead of me stopped for a traffic light I took my foot off the accelerator and allowed the regenerative brakes to slow my Tesla down. **When I put my foot on the brakes to stop the car it accelerated very fast** and I hit the pickup truck in front of me which hit the car in front of it. The airbags failed to inflate. Although there were no injuries the pickup driver is suing Geico for a neck injury. The was a very frightening situation. My car sustained severe damage and had to be towed

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

to repair. It will take at least 30 days to repair. The pickup also sustained considerable damage. The car it hit had very little damage.

NHTSA received the next SUA complaint involving a 2014 Tesla Model S on March 8, 2016 from Silverado, California. Complaint #10845619 alleges SUA at a stoplight.

I was stopped at a red light at an intersection the evening of March 2, 2016, without any notice, the car abruptly accelerated and hit the car in front of me. My foot was only on the brake, so there was no reason for the car to move forward, there was damage to my car, the car in front of me and a third car.

I experience this acceleration problem occurred with this car before, but no hazardous event occurred. Is there a problem with the computer overriding the control of this car?

On May 1, 2017, NHTSA received another SUA complaint from West Palm Beach, Florida. Complaint #10982961 says:

I was parking my car I heard and felt the car begin to accelerate. I put the car in park and step firmly on the brake peddle. Then of it own volition **it mounted the adjoining embankment and collided with the tree**. This caused extensive front end damage.

NHTSA received another SUA complaint, #11139174, involving a 2014 Tesla Model S in Kirkland, Washington in October 2018, which says:

The contact was loaned a 2014 Tesla Model S. While attempting to park the vehicle in the driveway, it spontaneously accelerated and crashed into another vehicle parked in the driveway. The air bags deployed. There were no injuries. After approximately one hour, the vehicle doors automatically locked and could not be unlocked with the key fob. A police report was not filed. The vehicle was not taken to the dealer for diagnostic testing. The manufacturer was not notified of the failure. The failure mileage and VIN were unknown.

With five complaints of Sudden Unintended Acceleration this is the safest car in Tesla's fleet in terms of SUA. Yet it's five times the control group average for unintended acceleration. The 2014 warrants investigation as part of a larger systemic problem with Tesla's vehicles.

2015 Tesla Model S

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Tesla made 24,361 Model S vehicles for the US consumer in 2015, according to NHTSA's Early Warning Reporting.⁴⁰ With an approximate average age per car of four years, this vehicle has 97,444 vehicle-years and sixteen NHTSA SUA complaints.⁴¹ The 2015 Tesla Model S has a SUA complaint rate of more than **16 per 100,000 car years**, or **1 SUA incident per 1523 vehicles**.

As a comparison, the 2015 BMW M3 has 3377 vehicles on the American roads, and with an approximate age of four years per car, or 13,508 vehicle-years, this model of BMW has no SUA complaints lodged with the NHTSA. The 2015 BMW M3 is comparable to the 2015 Tesla Model S as both are similar build cars with similar addressable markets.

The 2015 Toyota Prius V also comps with the 2015 Tesla Model S. The 2015 Toyota Prius is the vehicle in the control group most prone to receiving Sudden Unintended Acceleration complaints from the public, according to the NHTSA website, and has more than eight times the complaints of the control group average, when measured as complaints-per-100,000-miles. However, that is nearly 50% fewer than the 2015 Tesla Model S, which has complaints of approximately sixteen times the control group average.

Table 6: 2015 Model S Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2015	10764853	9/17/2015	Parking	Illinois, Lake Forest	0
Model S	2015	10810457	12/15/2015	Parking	Texas, Coppell	0
Model S	2015	10846206	3/1/2016	Driving	California, San Francisco	0
Model S	2015	10862194	4/29/2016	Parking	New York, New City	0
Model S	2015	10864353	5/11/2016	Parking	Louisiana, Denham Springs	0
Model S	2015	10874744	6/17/2016	Parking	California, San Jose	0
Model S	2015	10875699	6/21/2016	Parking	Illinois, West Chicago	0
Model S	2015	10910065	9/27/2016	Parking	Arizona, Tucson	1
Model S	2015	10968322	3/24/2017	Parking	California, La Verne	0
Model S	2015	10979378	4/19/2017	Stopped At Traffic Light	California, Laguna	0

⁴⁰ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

⁴¹ NHTSA SUA complaints for 2015 Tesla Model S: #10764853, #10810457, #10846206, #10862194, #10864353, #10874744, #10875699, #10910065, #10968322, #10979378, #10995382, #11075212, #11078571, #11132094, #11171052, #11220202

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

					Woods	
Model S	2015	10995382	6/15/2017	Driving	Colorado, Denver	2
Model S	2015	11075212	2/27/2018	Unknown	Texas, Houston	0
Model S	2015	11078571	3/11/2018	Parking	Michigan, Ann Arbor	0
Model S	2015	11132094	9/28/2018	Parking	California, Los Angeles	0
Model S	2015	11171052	1/20/2019	Parking	North Carolina, Chapel Hill	0
Model S	2015	11220202	6/14/2019	Driving	Illinois, Westmont	0

The first of the 2015 Tesla Model S reports, NHTSA complaint #10764853, arrived from Lake Forest, Illinois, on September 17, 2015. It tells the NHTSA of a SUA event while parking.

Car was parked in the parking lot. **While backing the car, it spin fast out of control even though backing was started at a very slow speed. Car stopped after hitting four vehicles directly, and one of the vehicle hit other two vehicles.** Major damage on the Tesla car in on driver side at back, where it hit other cars. It spin almost 180 degrees facing in the opposite direction. It hit the cars on both side of the parking lot lane. It all happened in 2 to 3 seconds.

In December 2015, NHTSA received complaint #10810457 from Coppell, Texas describing another SUA crash while parking.

On the afternoon of November 25, 2015, I was driving into a strip mall parking lot. I was going to pull into one of those spaces where you can park perpendicular to a sidewalk curb and the sidewalk leads up to the store fronts.

When approaching the parking space, the car was already in regenerative braking mode, and according to Teslas logs, the car slowed down to 3.5 MPH. Since the car had enough momentum to roll into the space on its own, my foot was not on the accelerator or the brake pedal. My foot was up resting on its heel, ready to tap the brake when it got close enough to the curb.

While the car was coasting into the space the motor was very quiet. All of a sudden, I heard a whirring sound from the motor. I dont know how better to describe it, than to say it was almost like the motor went from a state of slumber to a full state of awareness.

I believe the motor was whirring loudly for about a second before the car took off at such a fast pace and wound up hitting a brick wall. It happened so quickly, I didnt have any time to react. After the impact, I didnt even know the airbags deployed until I opened my

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

eyes and saw the deflated airbags in the car. It looked like the car jumped the curb, hit the brick wall, bounced backwards from the impact and landed back into the parking space.

According to Teslas logs, the data reads that the pedal was depressed down to 97% and the cause of the accident was due to driver error. I stand firmly by my statement that my foot was not on either the accelerator or the brake pedal when the car accelerated. Data may show there was pedal depression but I did not do the depressing. This was due to unintended acceleration by the car.

In March 2016 a report from a driver in San Francisco, California, #10846206, came to the NHTSA involving driving using autopilot while on the highway. Although this petition excludes reports in which Tesla's autopilot system may seem more likely to be at fault, this report seems to implicate vehicle design and drivability as the cause of the acceleration. It's worth noting this report is an outlier from other reports, which disproportionately involve SUA from a parked position, while parking, while at a stop light, or similarly traveling at slow speeds. However as similar reports of SUA among the control group were counted against the control group vehicles, this report remains in, and reads as follows:

While using the autopilot on a busy I-80 Freeway in San Francisco. I was driving south and in the middle lane trying to make a lane change into the left lane.

I hit the speed adjuster knob instead of the turn signal, this automatically increases the speed of the car without intending to perform such action. This action could prove fatal if a bicyclist or other bikes in the category are in front. This is a design flaw. The turn signal is too close to the speed adjuster knob, and I could foresee a safety incidence occurring due to this lapse.

Thank you.

In April 2016 NHTSA received a new complaint, #10862194 from New City, New York, alleging SUA while parking at a bank.

The car was being slowly pulled into a parking space at a bank when it expectantly accelerated. It jumped a curb, passed [through] shrubs, clipped a tree, and was able to be steered away from a light pole. It came to rest half into the road. There were skid marks from the attempted braking that were photographed. None of the safety features including proximity warning, and collision avoidance or air bags activated.

NHTSA received another complaint in May 2016, complaint #10864353 from Denham Springs, Louisiana, which describes an acceleration event while parking.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

While driving slowly ~5MPH in a Wal Mart parking lot, my wife went to pull into a parking spot, she took her foot off the accelerator pedal and the car accelerated “fully” almost hitting the car in front. My wife had to slam on the brakes to prevent an accident.

The next complaint for this vehicle, #10874744, arrived June 17, 2017 from San Jose, California.

Unintended, uncommanded acceleration. Car rapidly accelerated to maximum throttle during parking maneuver in a parking structure. **I was travelling at 3MPH. Car accelerated, hit another vehicle and a wall.** Tesla claims vehicle logs show throttle was commanded to 98%. At no time did I have anything but a light touch on the throttle.

NHTSA received another 2015 Tesla Model S complaint, involving Tesla’s autopark feature, which seems strikingly similar to the other SUA events. Complaint #10875699 from West Chicago, Illinois, says:

Electronic parking, while the automobile in the garage I pressed the parking option. The automobile surged, **rammed the garage, backed up and rammed the garage again** and careened backwards into the street.

In September 2016 NHTSA received complaint #10910065 detailing the SUA-caused injury crash of a 2015 Tesla Model S in an elementary school parking lot in Tucson, Arizona.

I drove the car into a parking space at the school (Desert Christian Elementary) in Tucson Arizona on Sept 16th about 11:05 AM, **when the car accelerated on its own (unintended acceleration) and crashed into 2 parked vehicles** and airbags deployed and I sustained a fracture of my right arm requiring surgery. Also my car (the Tesla Model S) was damaged and the two other parked cars.

In March 2017 NHTSA received a similar complaint, #10968322, which describes a SUA-crash in a La Verne, California, office parking lot.

I was parking in my usual parking spot in a parking lot at my office at approximately 8:15 A.M. As I approached my parking spot, I slowed my car by pressing on the brake and made a 90 degree turn into my parking spot. The vehicle was slowing moving forward and was less than 10 feet from where I intended to stop the vehicle when the vehicle **suddenly accelerated on its own and crashed into the concrete wall** that was at the base of my parking spot, causing the cars airbags to deploy. I did not have my foot on the accelerator pedal at the time the vehicle accelerated into the wall. I informed Tesla of the incident and they told me that the vehicle had experienced 100% acceleration immediately prior to the collision with the wall.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

In April 2017 NHTSA received yet another SUA complaint about a 2015 Tesla Model S, this time from Laguna Woods, California. Complaint #10979378 has been summarized on the NHTSA website as follows:

The contact owned a 2015 Tesla Model S. The contact stated that when stopped at the signal, the **vehicle accelerated independently without warning. As a result, the vehicle crashed into the vehicle in front.** A police report was filed but was not diagnosed or repaired. The manufacturer was not made aware of the failure. The failure mileage was 6,000.

A Denver, Colorado driver reported a SUA event in their 2015 Tesla Model S which injured two people at a stoplight. Complaint #10995382 differs from the usual story of parking a Tesla or starting one's Tesla from a parked position, but does have several elements in common with the usual narrative.

Driving west on Hampden Ave towards intersection at Tarmac St.

Going the speed limit, & released the accelerator so that "engine braking" would slow the car.

But I was slowing down faster than necessary with ~100 yards remaining to reach the intersection.

I lightly pressed the accelerator to stop engine braking briefly, then released the accelerator to reinstate "engine braking".

Instead of slowing, my car began to wildly accelerate.

Alarmed at the increasing speed of the car, as I was rapidly approaching the intersection where the signal was red, (another car was already stopped at the signal). Quickly applied the brakes but car was traveling too fast to avoid impact with the other car. Other car was significantly damaged, though it seemed unlikely (based on comments from the paramedics & police) that the other driver & passenger were injured, but were transported to an ER to be checked.

I was so stunned at what had happened that I initially thought I may have pressed on the accelerator rather than the brake (I've never done that in my 55 years of driving). But 2 days later, after my mind had cleared, I could recall the details of the situation, and I'm convinced that the actual events occurred in the order described above.

Another piece of information: 2 times within the prior week, when getting into my car (away from my home), the car indicated "preparing to drive" or something to that effect (not a message I normally see), the message persisted, so both times I had to reboot the

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

computer system, to make the car drive-able. Could this be at all related to the accident on June 9th?

[The car, currently in a body shop, logs the driving history, and may be able to support, or not support, my memory of what happened. It may help to differentiate whether this was a computer hardware/software [or] mechanical glitch, vs operator error.]

A driver from Houston, Texas, submitted complaint #11075212 to the NHTSA on February 27, 2018, alleging a Sudden Unintended Acceleration event in the summer of 2016, which was summarized as follows:

The contact owns a 2015 Tesla Model S. The contact stated that the vehicle experienced unintended acceleration after making contact with a curb. It was discovered that the automatic transmission feature was turned off. The contact stated that the failure occurred without warning. No dealer the car is purchased directly from California. The manufacturer was contacted, but no further communication was initiated. The failure mileage was approximately 6,000.

A driver in Ann Arbor, Michigan reported similar Tesla SUA issues in a March 2018 report to the NHTSA. In complaint #11078571 the driver tells of not only the vehicle problems preceding the crash and the crash itself, but also Tesla's lack of helpful response. They comment specifically that Tesla's version of events does not match the reality of the situation on the ground. Emphasis added:

While pulling into a perpendicular parking spot in a parking garage; at ~4-5 feet from a wall, resulting in moderate body damage to the front of the car and deploying the driver-side airbags. There were no other passengers in the car, and there was no significant injury or damage to the garage or other cars. Though I recognize that the vast majority of accidents of this type are due to driver error, there are several factors that leave me with concern for a possible electronic systems malfunction. Specifically, ~3 days prior to the accident, the car began displaying a constant error message: driver assistance features unavailable. I notified Tesla Service by phone and email, and on their instruction, rebooted the computer system, and fully powered down and restarted the system. However, the error message persisted. The accident occurred before I was able to schedule a service call. **I have requested details from the data logs for the accident from Tesla, but they have provided only very limited information, stating that legal action on my part would be required to obtain more detail.** They have told me that the car speed was 3.6 MPH at which time the data indicates that **the accelerator was pressed to as far as 100%**, resulting in acceleration of the car to 7 MPH at the time of impact, with this acceleration occurring over a 2 second time period. **This information seems incompatible with the otherwise rapid acceleration typically exhibited by this car with a fully depressed accelerator, and the short distance traveled (only several feet).**

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

In September 2018 NHTSA received another report, this from Los Angeles, California, of a 2015 Tesla Model S driver experiencing sudden acceleration leading to a crash in a local parking lot. Complaint #11132094 says:

A malfunction caused the sudden deployment of the airbags and subsequent unintentional unexpected acceleration causing the vehicle to jump a cement block and violently smash into a pole while I was slowly pulling into a parking stall at a grocery store.

The most recent SUA report from a 2015 Tesla Model S driver was sent to the NHTSA in January 2019 by a driver in Chapel Hill, North Carolina. In complaint #11171052 they tell a familiar story:

As I parked my car in my garage on 1/19/2019, I had placed the car in park and was preparing to exit the vehicle when it suddenly accelerated and hit the front of my garage wall. The car was in park and not moving. I had my hand on the door handle to exit. I immediately slammed the breaks but **the car seemed to keep going into my wall and then it jolted and stopped. It was like it had a mind of its own.** There was no alert or anything. It just suddenly accelerated while in park. As you can imagine this is a very scary occurrence and I am not going to drive this vehicle until it is rendered safe. Im very concerned with what could happen if this occurred in a parking lot or area with people. I contacted Tesla immediately following the incident to file a report and share my concern. They told me they would pull logs and be in touch. I also called my insurance company. The incident happened at 5:50 PM.

In June 2019 another acceleration event happened in Westmont, Illinois. Complaint #11220202 tells the NHTSA of another event in which the driver is sure they pushed the brake yet found the car accelerating - in this case while driving behind a semi-truck while in thick traffic.

On Thursday, June 7 around 6:30 pm I met with a bizarre incident on my 2015 Tesla Model S, 70D. Incident took place on RT 83 near Oak Brook Mall near Chicago.

The car slowly rolled and approached a semi in front in a traffic jam. I heard a beeping sensor as it was about to touch the semi, I immediately pressed the brake but the car started accelerating instead. I thought I must have pressed the gas pedal, so immediately lifted my foot to make sure I was pressing the break pedal. The second time also it started accelerating and kept pushing the semi in front because it was touching it.

Perplexed I then brought the car to parking mode to make it stop. As the semi started moving again and there was sufficient gap, the car started functioning normally.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

I got a repair estimate on the following day from a Tesla approved garage and they have quoted above \$4000 to repair.

The 2015 Tesla Model S warrants NHTSA investigation and recall for Sudden Unintended Acceleration as it has received sixteen times the average number of complaints per vehicle.

2016 Tesla Model S

Tesla made 28,413 Model S vehicles for the US consumer in 2016, according to NHTSA's Early Warning Reporting.⁴² With an approximate average age per car of three years, this vehicle can claim 85,239 vehicle-years, and ten NHTSA SUA complaints.⁴³ The 2016 Tesla Model S has a SUA complaint rate of more than **11 per 100,000 car years, or 1 SUA incident per 2842 vehicles.**

As a comparison, the 2016 Mercedes-Benz C-Class has 80,152 vehicles on the American roads, and with an approximate age of three years per car, or 240,456 vehicle-years, this model of Mercedes has two SUA complaints lodged with the NHTSA, giving the 2016 Mercedes-Benz C-Class a SUA complaint rate of 0.83 per 100,000 vehicle-years. The 2016 Mercedes-Benz C-Class is comparable to the 2016 Tesla Model S as both are similar luxury sedans with similar addressable markets.

Table 7: 2016 Model S Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2016	10864163	5/10/2016	Parking	Maryland, Frederick	0
Model S	2016	10949955	2/6/2017	Driving	California, Mountain View	2
Model S	2016	10953656	2/9/2017	Parking	California, Pasadena	3
Model S	2016	11000077	3/30/17	Stationary - Parked	California, San Jose	0
Model S	2016	11042211	11/1/2017	Parking	Texas, Desoto	0
Model S	2016	11054973	12/15/2017	Parking	Washington, Olympia	0
Model S	2016	11066047	1/31/2018	Parking	Florida, Miami Beach	0
Model S	2016	11079500	3/15/2018	Parking	Arkansas, Rogers	0

⁴² Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.

<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

⁴³ NHTSA SUA complaints for 2016 Tesla Model S: #10864163, #10949955, #10953656, #11000077, #11042211, #11054973, #11066047, #11079500, #11100721, #11118541

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model S	2016	11100721	6/9/2018	Parking	Hawai'i, Honolulu	0
Model S	2016	11118541	8/8/2018	Parking	California, Laguna Niguel	0

In May 2016 the first complaint of SUA involving a 2016 Tesla Model S was submitted to NHTSA from Frederick, Maryland. Complaint #10864163 tells the public of two separate unintended acceleration events involving two drivers of one vehicle.

Unintended acceleration occurred on 2 separate occasions with 2 different drivers within 2 weeks. Model S 70D

Incident 1: My wife was at a stop sign. She removed her foot from the brake and before applying the accelerator the car surged forward aggressively. Since her foot never touched the accelerator she was able to apply the brake and stop within 8-10 feet. She was visibly shaken when she got home but, regrettably, no report was filed.

Incident 2: About 2 weeks later, May 6, I was pulling into my garage with my wife and baby in the vehicle. 2-3 feet from the garage wall (in creep mode) I gently touched the brake to come to a stop. At that point the car surged forward very aggressively. I immediately applied heavy brake and was able to stop the car in a few feet (since my foot was already over the brake pedal). The front end hit the garage wall and penetrated 10-12 inches causing drywall damage and significant damage to our powder room on the other side.

A report with Tesla was filed immediately. Logs were [downloaded] and show that the accelerator was depressed to 97% power in less than a second and that it was driver error. My wife and I have 48 years of accident free driving and neither of us have ever mistaken control pedals or have ever floored a gas pedal in a second.

My wife is ■ healthy and a physician, I am a healthy ■ year old pilot. We can both say with 100% certainty that neither incident was driver error. Tesla has a serious unintended acceleration problem also made evident by the other complaints filed on NHTSA, all of which seem to fall under similar operating parameters.

We now have a \$90,000 car sitting in our garage that is unsafe for my family, it seems Tesla is going the route of waiting for injury and deaths to occur before they acknowledge this safety defect.

In February 2017, a 2016 Tesla Model S owner in Mountain View, California, reported a SUA-caused 2-injury accident to the NHTSA in complaint #10949955. They recount a story of SUA while driving which resulted in two injuries.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

I was stopped at a stop light on my way to work around 8am on a very crowded city street. As the light turned green, I slowly pressed on the gas to move forward and **the car took off at top speed**. I hit the brake but the car did not respond - **it did not slow down or stop**, nor did any alarm, either visual or auditory, go off inside the car. [I] **hit the car in front of me and then had to swerve to avoid hitting dozens of cars in my path. I grazed past a lamp post, another car and finally crashed into a tree.**

NHTSA received another complaint in February 2017 from a 2016 Tesla Model S owner who experienced a SUA event while parking at their house, resulting in a crash and three injuries. Complaint #10953656 comes from Pasadena, California.

Complainant, a physician, had taken delivery of a 2016 Tesla Model S on December 22, 2016. The following day, **she pulled into her driveway at home and brought the vehicle to a stop. With her foot still on the brake, the vehicle suddenly accelerated on its own from a stopped position to speeds of between 40-60 MPH.** The vehicle plowed through the bricks of her driveway, through shrubs separating her property from her neighbor, **went through and across the neighbors yard and onto [an] adjoining street, where it collided with a truck.**

In June 2017 NHTSA received complaint #11000077 detailing a SUA-caused crash in San Jose, California.

The contact owns a 2016 Tesla S60. **While the contact was attempting to exit the parked vehicle, it independently accelerated. The vehicle crashed into a pillar.** A police report was not filed and there were no injuries. When the brakes were applied, the vehicle came to a stop. The contact stated that she was uncertain if she may have depressed the accelerator pedal accidentally. The local dealer (Tesla 750 E. El Camino Real, Sunnyvale, CA, 94087) confirmed that the vehicle was not able to be serviced until October of 2017. The vehicle was not diagnosed. The contact received notification of NHTSA Campaign Number 17V260000 (Parking Brake). The manufacturer was notified and informed the contact that the failure was still under investigation. The vehicle was repaired. The vin was invalid. The failure mileage was approximately 5,9777. Updated 08/23/17

NHTSA received another SUA complaint involving a 2016 Tesla Model S in October 2017. The driver, from Desoto, Texas, says the Tesla suddenly accelerated while parking, leading to a crash.

The contact owns a 2016 Tesla Model S. **While parking, the vehicle inadvertently accelerated and crashed into a fence and a neighbor's air conditioning unit.** The brake pedal was depressed, but the vehicle failed to stop. There were no warning indicators illuminated. There were no injuries. The police arrived at the scene, but the contact was unaware if a police report was [filed]. The vehicle was towed to

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Dallas-Cedar Springs Road Tesla (6500 Cedar Springs Road, Suite 100 (214) 736-0587), but no failures were diagnosed. **The contact was informed that the failure was due to human error.** The body damage was repaired. **The contact stated that the failure occurred a second time while parking in a hospital parking lot. The vehicle accelerated without warning, jumped a curb, and collided with a metal pole, a small tree, and an ambulance.** The hospital police was at the scene, but was unaware if a report was filed. The vehicle was towed to John Eagle Collision Center (6125 Peeler St, Dallas, TX, 75235 (855) 575-6368), but no repairs or diagnostic testing were completed. **The manufacturer was notified of the failure and offered no assistance.** The failure mileage was approximately 5,000.

NHTSA received another SUA crash report involving a 2016 Tesla Model S in December 2017. In complaint #11054973 the Olympia, Washington-based driver details their experience of attempting to park the car in a Costco parking lot.

While attempting to park my Tesla S75 D in a Costco space, the car bolted. It felt like it was in autopilot mode without me engaging it manually. I slammed on the brakes. It hit the rear bumper of the car parked in front. Fortunately, it didnt do any damage to that vehicle but it caused plenty of damage to my front end. [I will] need a new bumper and hood. It also deactivated my autopilot and radar which are behind the bumper. I can still drive the car and feel fairly safe as I believe the computer accidentally engaged the autopilot and now the autopilot isnt operational. However, I no longer trust this car. Ive presented this problem to Tesla and they said [it] was user error but **there is absolutely no doubt in my mind that I was not at fault.** Ive done research and there is a class action lawsuit in the works as this has happened to other Tesla users. My advise, dont buy a Tesla!!!!

Six weeks later, in late January, 2018, NHTSA received another complaint of a SUA-caused crash in Miami Beach, Florida. In complaint #11066047, the driver experienced unintended acceleration while parking.

My husband was driving my car, we arrived at the parking lot and as he was pulling into a parking space and coming to a stop, **the car suddenly accelerated at high speed, went over the cement bumper for the space, over the one for the space in front and hit a parked Saturn** in front of us. **He is certain that he was braking at the time.** We took the car in to Tesla who ran a diagnostic. **They advised that the throttle went suddenly from 2% to 97% and then the brake was applied, but when I asked for more details about the approach to the parking space, for a copy of the report they said they would not provide it without a subpoena.**

In March 2018 another 2016 Tesla Model S driver submitted a SUA crash report to the NHTSA, complaint #11079500 from Rogers, Arkansas. The driver recounts accelerating rapidly into a building while attempting to park outside.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

I was attempting to park in front of a retail business when the car suddenly and unexpectedly accelerated. I believe this accident was caused by a malfunction or glitch in the vehicles troubled software for driver assist and/or safety features. Features which are unique to Tesla.

The sudden and unexpected acceleration happened with no input to the accelerator pedal. I was lightly braking, intent on coming to a complete stop. I had nearly completed the parking maneuver when the car raced forward, jumped a curb, knocked down a handicapped parking sign, traveled across a walkway and smashed into the front of the business. This happened so fast, I didnt realize what occurred until I could gather my thoughts after the incident. No audible or visual warning of an impending collision were heard or seen. No airbags deployed.

Fortunately no one inside the business, no pedestrian nor myself were injured. This could have been a [tragic] accident. My Tesla sustained over \$25,000 in damage and is still in the repair shop. As of this date, no claim has been settled for repairs to the business property.

In June 2018 NHTSA received a similar SUA crash report from Honolulu, Hawai'i. Complaint #11100721 recounts this SUA crash into a garden wall.

On 2/20/18 I was driving up my driveway. Upon reaching the top of the driveway, the car suddenly accelerated by itself resulting in the front of the car hitting the concrete wall in front. I informed **Tesla and they claim that the computer showed that I pressed on the accelerator instead of the break. My answer is that I did not pressed on the accelerator. It just accelerated by itself.** Aside from me, I have 4 passengers that can attest to this. I have lived in this place since 1986 and this has never happened. Since I have been driving up my driveway for almost 32 year, It is so routine for me that it is already ritual for me at almost the same speed and when to pressed on the gas and brake pedals the same way every time. This has not happened to my other cars and as my car insurance will show I have not been involved in car accidents for many years.

I have not been shown any evidence except what Tesla told me. It is their words versus mine and my 4 other passengers who experienced what actually happened.

I have problem trying to download pictures and correspondences/records here. I will be glad to mail them to you or some other ways with your instructions. Thank you.

NHTSA received another report of a 2016 Tesla Model S SUA crash in August 2018, #11118541 from Laguna Niguel, CA.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

While in reverse backing up to a charge station in a covered parking lot, the car went into sudden acceleration and failed to stop and collided with the charge station and the wall next to it. None of the warning lights or sounds went off either. Although the car has, on several occasions demonstrated its ability to stop short of colliding with obstacles, it failed to react in this instance. **Tesla has ignored our repeated requests for providing an explanation or any evaluation of the logs associated with the car, and has blamed the matter on driver error.**

This report indicates the 2016 Tesla Model S is particularly susceptible to Sudden Unintended Acceleration and there is enough information and a large enough sample size to investigate this matter further and initiate a recall. Tesla has the data in its possession that would clarify the issue, and if Tesla has a problem with SUA, they must already know.

2017 Tesla Model S

Tesla made 27,195 Model S vehicles for the US consumer in 2017, according to NHTSA's Early Warning Reporting.⁴⁴ With an approximate average age per car of two years, this vehicle can claim 54,390 vehicle-years, and fifteen NHTSA SUA complaints.⁴⁵ The 2017 Tesla Model S has a SUA complaint rate of more than **27 per 100,000 car years, or 1 SUA incident per 1813 vehicles.**

As a comparison, the 2017 Alfa Romeo Giulia has 8,648 vehicles on the American roads, and with an approximate age of two years per car, or 17,296 vehicle-years, this model vehicle has a single SUA complaint lodged with the NHTSA, giving the 2017 Alfa Romeo Giulia a SUA complaint rate of more than 5 per 100,000 vehicle-years, much higher than the control group average yet much lower than the 2017 Tesla Model S.

Table 8: 2017 Model S Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2017	11015893	8/14/2017	Parking	Florida, Coral Gables	0
Model S	2017	11021371	9/4/2017	Parking	New York, Bronxville	0
Model S	2017	11048161	11/23/2017	Parking	Washington, Bellevue	0

⁴⁴ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.
<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

⁴⁵ NHTSA SUA complaints for 2017 Tesla Model S: #11015893, #11113560, #11021371, #11048161, #11064628, #11065563, #11074547, #11078440, #11089262 #11093835, #11098517, #11121147, #11162968, #11174732, #11189710, #11229124

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model S	2017	11064628	1/24/2018	Parking	California, San Jose	0
Model S	2017	11065563	1/28/2018	Parking	California, Newport Beach	3
Model S	2017	11074547	2/23/2018	Stopped At Traffic Light	California, Santa Barbara	0
Model S	2017	11089262	4/21/2018	Parking	New Jersey, Paramus	0
Model S	2017	11093835	5/15/2018	Stopped At Traffic Light	California, Santa Clara	0
Model S	2017	11098517	5/29/2018	Parking	Florida, Naples	0
Model S	2017	11113560	7/25/2018	Parking	California, Laguna Niguel	0
Model S	2017	11121147	8/20/2018	Parking	California, Los Altos	0
Model S	2017	11162968	12/21/2018	Parking	Nevada, Henderson	1
Model S	2017	11174732	2/6/2019	Driving	New Jersey, North Bergen	1
Model S	2017	11189710	3/18/2019	Parking	California, Fallbrook	1
Model S	2017	11229124	7/3/2019	Parking	California, Palm Desert	2

In August 2017 NHTSA received a report of a SUA event during a parking attempt in Coral Gables, Florida. Complaint #11015893 tells the public of both the problem and the company's particularly problematic lack of response.

While turning right and slowly pulling into a parking space when I hit the brake the car accelerated rapidly and jumped over the bumper and landed in a grassy spot. Fortunately it didn't hit anything or anyone, I'm concerned that this could happen again and not have a benign outcome. Tesla's first reaction is "I" must have hit the gas [pedal] by mistake; I would like to accept that however I don't. To start a Tesla you touch the brake, more testing is needed to assure brakes don't create false acceleration this is a very dangerous situation. I was afraid to drive the car home on a busy street where pedestrians cross at stop light; imagine that outcome? Tesla needs to run test to determine if this malfunction of rapid acceleration when applying brakes is an engineering problem and not write it off as drivers hitting the gas!

In September 2017 a Model S owner in Bronxville, New York, submitted complaint #11021371 to the NHTSA recalling a SUA incident while parking.

The Tesla sped up and had a sudden unintentional acceleration. I was driving down the driveway slowly and the car suddenly accelerated to a very high speed. It almost went

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

over a wall and I had to swerve the wheel to avoid going over a wall. When I slammed on the brakes, the car stopped fully only a few inches away from another parked vehicle.

In November 2017 another 2017 Tesla Model S owner submitted a SUA complaint to the NHTSA, #11048161. The Tesla owner recounts this crash in the parking lot of a KidQuest Museum in Bellevue, Washington, with their one-year-old granddaughter in the car.

We were in a parking lot of “KidQuest Museum” in Bellevue, WA., taking our grand daughter, one year old, to the museum. Our car was in stationary position. We were trying to figure out where to park. During this time, our Model X, took off with unintended acceleration and we could not control the car. It was instantaneous, our car went and hit a parked Chevy van. This van [went] upside down and went over the fence into the lot next to it. After the impact our car went and hit [electric] pole, went into bushes and over an electrical box of 5 by 5. I could not open the door. There was smoke in the car (my wife thinks smoke might have started while the car was accelerating). Museum staff came and opened the passenger door. After she got out, first thing they did was to open the rear passenger door and took out our granddaughter. I came out thru passenger [door].

Fortunately no one was hurt. Many of the airbags came out. We are unbelievably lucky. The parking lot is approximately 100 ft x 100. This is the parking lot usually where many kids are in the lot. Fortunately that moment there was none. Accident happened around 4:20pm. Weather was gray but no rain. We still can not comprehend how car can take off at that speed. None of the emergency braking system or the cameras worked to stop the car

In January 2018 a 2017 Tesla Model S owner in San Jose, California, complained to NHTSA of SUA while parking their car in complaint #11064628.

Tesla Model S 2017 Sudden Unintended Acceleration-

1/18/2018, Morning 9:05 am. I was pulling in to my office parking spot where I parked for 6 years, I let the car slow to roll closer in front of the curb. **All of a sudden the car accelerated, got on the curb, hit the office building. The car was still going until I applied the brake.** The acceleration point was right before the curb, measuring from the point to the wall is only 7 feet. Tesla said I was on the pedal for a second long, I applied pedal from 0-18%, and quickly applied the brake. If I applied the pedal, I would not be able to apply my brake in a split second. Tesla refused to provide the force given to the pedal and any telegraphy. Tesla said they will not be responsible for any damage and said it is driver's error. I told my car was only 6 week new, I no longer feel safe to drive this vehicle, I request to return the car. Tesla refused. **Tesla claimed there is no parts failure and refused to do any failure analysis** without even looking at the car and accident pictures.

Consumer fighting with odds?--

When insurance company sent tow truck driver on the next day (1/29/2018), the driver said my car was the second brand new Model S he towed in the same week with the same issue. The other lady ran thru her drywall and got in her laundry room while parking, same situation-while letting the car "slow", roll itself. Given Tesla has manufactured close to 200,000 cars, launched 5 years since 2012, divided by 52 weeks a year, the odd is pretty high for the same issue --0.7%. At a total of 1400 Tesla cars out there, these 1400 cars are acting as ticking bomb for the design failure causing SUA. **I believe this issue requires NHTSA or federal regulation to take a look.**

Four days later the NHTSA received a similar SUA report, complaint #11065563, from Newport Beach, California. The owner of the 2017 Tesla Model S reports three injuries.

At our driveway on Sun. 1/14/18, coming back from shopping a few minutes before four pm, suddenly the car took off by itself. It accelerated tremendously with the speed which was felt around 65-80 M/HR, hitting our heavy garage door, which was closed at the time, went through the garage, hit my parked porsche and pushed it to the left to the water heater. It then hit and broke the wall between our garage and courtyard, broke and pushed our concrete planter and stopped halfway between the garage and our family room windows in the courtyard. I firmly believe that this was the result of unintended acceleration. This is our new and second Tesla my wife and I owned and drove. When my wife talked to local Tesla representative, he refused to give us any computer generated report. The car still on the wall between garage and courtyard. We understand, Tesla has a black box that we do not know where it will end up if we take it to Tesla certified body shop. We appreciate it very much if you advise us what to do.

A Santa Barbara, California 2017 Tesla Model S owner complained of unintended acceleration at a traffic light in February 2018 in complaint #11074547.

The contact owns a 2017 Tesla S75. While the vehicle was in autopilot mode, it independently veered to the left to make a lane change. **Additionally, while the vehicle was at a traffic light, it independently accelerated, made a sharp left turn, and drove into vegetation on the off ramp of a freeway.** There were no injuries and a police report was not filed. Tesla of Santa Barbara (400 Hitchcock Way, Santa Barbara, CA 93105, (805) 770-6090) was contacted and the vehicle owner was informed to have the vehicle repaired. Afterwards, a diagnostic test would be performed. The contact stated the failure recurred three times. The vehicle was not repaired. The manufacturer was notified of the failure. The approximate failure mileage was 3,000.

The above driver clarified their initial report in March 2018 in complaint #11078440.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

On 3 occasions, vehicle made sudden, spontaneous attempts to make a left lane change. On two occasions the vehicle was in self drive mode on a freeway; on the 1st occasion, the vehicle was in the left lane and hit a guard rail; on the 3rd occasion **the vehicle was stopped at a red light when it suddenly accelerated, turned sharply left and ran up an embankment into trees and bushes, sustaining substantial damage.**

In complaint #11089262 a 2017 Tesla Model S owner from Paramus, New Jersey filed a complaint with NHTSA in April 2018 alleging a SUA-crash in a local parking lot.

While pulling into a parking spot at a busy shopping center, and applying the brake pedal (having moved it over from accelerator) to stop the car at about 5 MPH, **the Model S suddenly lurched forward at full acceleration hitting not 1 but 2 parked cars. Nothing would stop the car as it took over and went forward with both my feet pressing the brake pedal as hard as I could. Finally it stopped after hitting a second parked car. Tesla has not responded, despite 2 days of emails and calls.**

NHTSA received a SUA report from a Santa Clara, California Model S driver in May 2018. Complaint #11093835 recounts unintended acceleration at a traffic light.

Stopped at a busy city street intersection for around 2 minutes waiting for the green light. My car was second car from the intersection on a slight up slope. Obviously the brake was fully engaged but my car suddenly creeps up slope and gently bumps into the car in the front. This impact pushes the other car forward and my car rolls back. The forward collision alarm went off but I could do little to stop the car other than try and press on the brake even harder. The car again rolls up again and gently bumps the other car again. Again the collision warning went off but I felt I had no control over the car. I could finally get the control back after that. Luckily there were no pedestrians and cross traffic had already stopped. Please note that there was little or no damage to either car. The car seemed to have a mind of it's own!

There was little chance of driver error in this case as I was just waiting for the green light and there was no panic situation for a mistaken accelerator press. I could not get access to the car logs as Tesla policy wouldn't allow it.

Please note that no self-driving software was installed and creep mode was off as it always is.

Two weeks later, in late May 2018, another 2017 Tesla Model S owner submitted a SUA complaint to the NHTSA, #11098517, from Naples, Florida.

The contact owns a 2017 Tesla Model S. **While attempting to park that vehicle at a low speed, the vehicle suddenly accelerated with the brake pedal depressed. The**

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

vehicle proceeded to jump the curb and crashed into some bushes. There was no warning indicator illuminated before, during, or after the failure occurred. There were no injuries and a police report was not filed. The vehicle was driven to the contact's residence. The vehicle was not taken to a dealer for diagnostic testing. The manufacturer was notified of the failure. The vehicle was not repaired. The failure mileage was 1,772.

In July 2018 NHTSA received complaint #11113560 from a 2017 Tesla Model S owner who unintentionally accelerated into their own garage door while attempting to park at their home in Laguna Niguel.

The contact owns a 2017 Tesla Model S. **While driving 5 MPH, the vehicle accelerated rapidly without warning. As a result, the contact crashed into a garage door.** The air bags did not deploy. A police report was not filed, There were no injuries sustained. The vehicle was towed to Tesla Buena Park (6692 Auto Center Dr, Buena Park, CA 90621, (714) 735-5696) and was awaiting diagnostic testing and repairs. The manufacturer was made aware of the failure. The failure mileage was approximately 10,000.

The incident date for the above report from Laguna Niguel is July 7, 2018. **On that same day** in Los Altos, California, another 2017 Tesla Model S owner experienced a similar event, recounted in complaint #11121147 and submitted to the NHTSA in late August, 2018.

I was making a legal U Turn on a city street to park. I pulled behind a parked car and was going about 1mph when my car suddenly accelerated and hit the parked car. There were no warning sounds until the car hit the other car and then the horn and lights on my car went off. The car was not on auto park and no air bags were deployed however my car and the car that was hit had extensive body damage. There were not injuries to people. I don't know why the car accelerated instead of stopping. I have never hit the accelerator [pedal] instead of the brake and I doubt if I did it in this case.

In December 2018 a 2017 Tesla Model S owner in Henderson, Nevada reported experiencing two SUA events in three months, filed with the NHTSA in complaint #11162968. The report notes injuries and vehicle damage in the first SUA crash and extensive car damage in the second SUA crash.

Our Tesla has had two incidents in the last three months of uncontrollable acceleration....once slowly going into a parking place and once backing out of our garage. The first one results in a couple of cracked ribs (with seatbelt on) and \$18,000 in damage. The second incident: the Tesla, when backing up went totally out of control by accelerating and it barreled across the street and knocking down a tree before coming to a stop. The Tesla is now in the repair shop with extensive damage to the rear of the car. Not sure yet of the dollar amount. I feel this is a serious defect in the Tesla Model S.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

In February 2019 NHTSA received complaint #11174732 from North Bergen, New Jersey, alleging unintended acceleration and loss of control on the freeway leading to an injury accident which totaled the car.

2017 Tesla Model S started to accelerate on its own over 100 MPH, when traveling on highway around 70 MPH, without autopilot engaged. As soon as it started to accelerate, the car took control over the steering wheel and drove into the guardrail on the left of the lane, then quickly steered to the right lanes and steered to the left again. Slammed on the brake but did not work at all, and steering wheel did not respond. The car completely took control over traveling over 100 MPH going zig-zag on three lane highway, finally came to a stop after hitting number of trees in the woods on the right side of the highway. The car is completely totaled.

In March 2019, NHTSA received another complaint of unintended acceleration. A person in Fallbrook, California, says in complaint #11189710 that their 2017 Tesla Model S accelerated through their garage and into their house as they attempted to park.

The contact owns a 2017 Tesla Model S. **While pulling in the driveway at approximately 5 mph, the contact attempted to step on the brake pedal to slow down the vehicle. However, the vehicle accelerated through the garage and crashed into the house.** There was no warning indicator illuminated. The air bags did not deploy. A police report was not filed. The contact sustained minor injuries that did not require medical attention. The contact stated that the vehicle would need to be towed. The contact called Tesla at 858-558-1555 (located at 4545 La Jolla Village Dr, Suite D17, San Diego, CA 92122) and was referred to the manufacturer. The manufacturer was made aware of the failure and provided a case number. The vehicle was not diagnosed or repaired. The failure mileage was 21,859.

In July 2019, NHTSA received another complaint of unintended acceleration leading to two injuries. Complaint #11229124 from Palm Desert, California, recounts the story of accelerating while attempting to park.

While attempting to park the car in a parking space the **car accelerated on it's own and crashed over a small concrete retaining wall and crashed into another vehicle.**

My car and the car that was struck were totaled.

The 2017 Tesla Model S has a very high rate of reported Sudden Unintended Acceleration relative to other cars. This petition has enough information to warrant further investigation into this car and all other Tesla-made vehicles, and to recall them for a systemic safety defect.

2018 Tesla Model S

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Tesla made 27,296 Model S vehicles for the US consumer in 2018, according to NHTSA's Early Warning Reporting.⁴⁶ With an approximate average age per car of one year, this vehicle can claim approximately 27,296 vehicle-years using the method described previously in this petition. This car has received six NHTSA SUA complaints.⁴⁷ The 2018 Tesla Model S has a SUA complaint rate of nearly **22 per 100,000 car years**, although this measure will become more accurate with the passing of time. **Two-thirds of all owner-complaints made to date of the 2018 Tesla Model S involve Sudden Unintended Acceleration.**

As a comparison, the 2018 Toyota Camry SIF has 401,910 vehicles on the American roads, and with an approximate age of one year per car, approximately 401,910 vehicle-years, this model vehicle has three SUA complaints lodged with the NHTSA, giving the 2018 Toyota Camry SIF a SUA complaint rate of less than 1 per 100,000 vehicle-years, approximately in line with the control group average and much lower than the 2018 Tesla Model S.

Table 9: 2018 Model S Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2018	11100216	6/6/2018	Parking	California, Near Buena Park	1
Model S	2018	11102347	6/18/2018	Driving	California, San Diego	1
Model S	2018	11155579	12/3/2018	Parking	California, Walnut	1
Model S	2018	11183545	3/1/2019	Parking	California, Palo Alto	0
Model S	2018	11209483	5/23/2019	Parking	Minnesota, Maple Grove	2
Model S	2018	11228597	7/1/2019	Parking	Minnesota, Plymouth	0

The first SUA complaint involving the 2018 Tesla Model S arrived with NHTSA on June 6, 2018. Complaint #11100216 alleges acceleration while parking, leading to an injury crash near Buena Park, California.

The contact owns a 2018 Tesla Model S. While attempting to park the vehicle, it independently **accelerated and crashed into a wall**. The air bags deployed. A police report was not filed. The contact sought medical attention then days later for a sternal fracture. The Tesla Buena Park dealer (6692 Auto Center Dr., Buena Park, CA 90621,

⁴⁶ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics. <https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

⁴⁷ NHTSA SUA complaints for 2017 Tesla Model S: #11100216, #11102347, #11155579, #11183545, #11209483, #11228597

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

(714) 735-5696) was contacted and the vehicle was towed to a Tesla approved facility to be diagnosed. The contact was informed that the on board diagnostic testing reported that the accelerator pedal was depressed at the time of the crash. The contact was also informed that the automated features, including the cruise control were unable to have induced the accelerated response. The vehicle was not repaired. The manufacturer was also notified of the failure. The approximate failure mileage was 214.

The next SUA complaint arrived with NHTSA twelve days later, from San Diego, California. Complaint #11102347 tells the NHTSA of an unintended acceleration event while driving, resulting in injury.

The contact owns a 2018 Tesla Model S. **While approaching a red light, the speed increased and the vehicle failed to respond when the brake pedal was depressed. The vehicle drove through the traffic light and crashed into a vehicle that was making a left turn.** The front drivers air bag and knee air bags deployed. The front drivers side curtain air bags had not deployed. The driver sustained shoulder and back injuries that required medical attention. A police report was filed. The insurance company towed the vehicle to a collision repair facility. The dealer (San Diego Miramar Tesla, 9250 Trade Pl, San Diego, CA 92121, (858) 271-5100) was notified of the crash and the contact was waiting for feedback from the insurance company. The dealer and the manufacturer were waiting to retrieve the information from the electronic data recorder to investigate the cause of the failure. The approximate failure mileage was 49.

The 2018 Tesla Model S received another SUA report in November 2018, #11155579, when a driver in Walnut, California, accelerated into their own home unintentionally.

Car was stopped prior to entering car garage. **Car suddenly reversed then sped up autonomously and crashed into the home.** Suspect car electronics compromised and endangered driver. Requesting investigation if car defect vs user error.

Thank you!

In March 2019 a 2018 Tesla Model S driver in Palo Alto filed NHTSA report #11183545 alleging unintended acceleration while parking.

The contact owns a 2018 Tesla Model S. **While attempting to make a left turn from a parking space, the vehicle accelerated backwards in a tight circle.** The vehicle struck some trees on the passenger side and crashed into another vehicle that was parallel parked on the same street. There was no warning indicator illuminated. A police report was filed. There were no injuries. The vehicle was damaged and towed to a tow yard. The contact called the manufacturer and was connected to Tesla Roadside Assistance. The contact requested the dealer. Tesla (831-264-6896, located at 1901 Del Monte Blvd, Seaside, CA 93955) was notified, but did not assist. The contact did not

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

know if the vehicle was totaled. The cause of the failure was not determined. The failure mileage was 4,757.

In May 2019 NHTSA received complaint #11209483 from Maple Grove, Minnesota alleging their 2018 Tesla Model S unintentionally accelerated through their garage door and into a parked SUV, leaving two people injured.

The car unintended accelerated when I pulled into garage and wait for garage door open. The sudden acceleration is totally out of control, even my foot firmly step on the break pedal. The accelerated car went through the garage door towards right, and hit and lift the other parked SUV inside the garage. The speed and force push the SUV towards the back of garage wall, and totally damaged the part of my garage.

The above SUA complaint involved an incident which **occurred on May 12th, 2018. On May 2nd, 2018 in nearby Plymouth, Minnesota, there was another SUA crash.** The owner recounts in NHTSA report #11228597 they were parking their car at work when the vehicle accelerated.

I drove to work on May 2, 2019, and was trying to park in my allotted parking stall on the 3rd level of my office parking garage. My parking stall was along the outer edge of the garage and the only barrier to the outside was a set of three (about 3/4" diameter) cables strung between outside columns of the garage, besides a think perforated corrugated metal sheet outside the cables, acting as a rain stop. I was trying to slowly turn right from the parking aisle to park between two pickup trucks on either side of my stall. **When I had turned partway into my stall, my Tesla suddenly accelerated into my parking stall at high speed,** hit the outside cables, rebounded backwards and stopped about 10 feet from the outside cables. The cables saved me from plunging 3 floors down from the garage. There was extensive damage to the hood and front portions of my Tesla. There was also some damage to the metal corrugated sheets outside the cables and a slight dent on the corner of the vehicle parked to my right.

I have been parking in my office parking stall for about the past six months without any issue like this. I want to know why my car accelerated like that without warning and why the collision warning system was not triggered by the outside corrugated metal sheet.

Also, there was an issue with my Tesla the previous evening. When I tried to start my Tesla after work, I got the systems are powering.. message on the screen and my car would not start even after a long wait. Then, I had to google to find a way to reboot the car computer, by pressing two buttons on the steering wheel. On the day of the accident, I used the intermittent rain sensing wipers for the first time, as there was a light rain.

My car is still in the body shop waiting for some ordered parts. I have asked Tesla to do a diagnostics to see if there were any software bugs in the system.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

This petition presents enough information to indicate that a systemic problem may exist with these vehicles and the consumer and general public would benefit from NHTSA investigation.

Tesla Model 3

2018 Tesla Model 3

Tesla made 145,406 Model 3 vehicles for the US consumer in 2018, according to NHTSA's Early Warning Reporting.⁴⁸ With an approximate average age per car of one year, this vehicle can claim 145,406 vehicle-years, and fifteen NHTSA SUA complaints.⁴⁹ The 2018 Tesla Model 3 has a SUA complaint rate of more than **10 per 100,000 car years**, although that figure will become more accurate as time passes.

As a comparison, the 2018 Ford Focus has 123,592 vehicles on the American roads, and with an approximate age of one year per car, or 123,592 vehicle-years, this model-year vehicle has a solitary SUA complaint lodged with the NHTSA, giving the 2018 Ford Focus a SUA complaint rate of less than 1 per 100,000 vehicle-years, approximately in line with the control group average and much lower than the 2018 Tesla Model 3.

Table 10: 2018 Model 3 Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model 3	2018	11091970	5/4/2018	Parking	Arizona, Chandler	0
Model 3	2018	11092830	5/10/2018	Parking	Delaware, Dover	0
Model 3	2018	11097159	5/22/2018	Parking	Arizona, Phoenix	0
Model 3	2018	11119991	8/14/2018	Parking	California, San Francisco	0
Model 3	2018	11124067	9/2/2018	Parking	California, Riverside	0
Model 3	2018	11132177	9/28/2018	Parking	California, Simi Valley	0
Model 3	2018	11133222	10/3/2018	Parking	Massachusetts, Lexington	0
Model 3	2018	11154132	11/26/2018	Driving	Ohio, Upper Arlington	0
Model 3	2018	11164094	12/30/2018	Parking	California, Burlingame	0

⁴⁸ Using NHTSA's EWR website, search for "Manufacturer: Tesla, Inc.", "Report Type: Light Vehicle Production", "Reporting Period: Year: 2019, Quarter: 1" to find the relevant production statistics.

<https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>

⁴⁹ NHTSA SUA complaints for 2018 Tesla Model 3:

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model 3	2018	11165284	1/4/2019	Driving	California, Union City	0
Model 3	2018	11196764	3/30/2019	Parking	Georgia, Snellville	1
Model 3	2018	11202909	4/22/2019	Driving	New Mexico, Placitas	0
Model 3	2018	11206155	5/7/2019	Parking	Georgia, Atlanta	0
Model 3	2018	11207877	5/15/2019	Stopped At Traffic Light	California, San Diego	0
Model 3	2018	11209238	5/22/2019	Parking	Virginia, McLean	0

Of the 2018 Tesla Model 3 SUA complaints, there are two from Arizona. On May 4th a driver from Chandler unintentionally accelerated and crashed in a grocery store parking lot. And on May 5th a driver unintentionally accelerated and crashed in nearby Phoenix. These incidents happen to be geographically and temporally similar. NHTSA complaint #11091970 recounts the first of these incidents, from Chandler, Arizona.

Unintended Acceleration of 2018 Tesla Model 3.

Issue Description: Issue occurred on 05/04/18 at approx. 11:52 am while trying to park the vehicle in a parking lot of a grocery store. The vehicle was in the parking space position when it suddenly accelerated without any input from the driver. The brakes were applied however they felt inoperative. It felt as though the driver had no control over braking and the vehicle had a mind of its own. The driver turned the steering wheel to avoid directly hitting a dumpster while trying to brake. The passenger side of the vehicle then hit a curb and a pony wall. After the impact, the driver was able to turn the vehicle while applying the brakes that eventually brought the vehicle to a stop.

Probably Cause: Unknown. Given the vehicle is new, it is difficult to identify a reason why would it accelerate unintentionally. The vehicle is equipped with enhanced auto pilot which was not engaged at the time of incident. The night prior to the incident the vehicle displayed software glitch where in it would not control the volume of the radio while driving with the buttons on the steering wheel and was stuck in controlling the steering wheel position.

Car is running software version 8.1 (2018.14.13 9E3B7FF)

The second of these two, from Phoenix, Arizona, and filed with NHTSA on May 22nd 2018 as complaint #11097159 recounts a similar story.

Driver felt sudden unintended acceleration while parking the car. **The acceleration happened within the last couple of seconds when the car was turning 90% at pretty normal speeds to park. The car hit a tree, and suffered significant frontal damage.**

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

On May 10, 2018, a driver in Dover, Delaware experienced a similar unintended acceleration into the front of a store. Complaint #11092830 summarizes the incident.

The contact owns a 2018 Tesla Model 3. While attempting to park the vehicle, **the brake pedal was depressed, but the vehicle accelerated rapidly on its own without warning. As a result, the vehicle drove over a curb and crashed into part of a store.** The front end of the vehicle was damaged. The air bags failed to deploy. A police report was filed and there were no injuries. The vehicle was driven to the contact's home. The contact notified Tesla's Service Center at (610) 407-7030, but the dealer and manufacturer were not contacted. The vehicle was not diagnosed or repaired. The failure mileage was not available.

In August 2018, the NHTSA received another SUA-caused crash report, #11119991 from San Francisco, California.

Sudden Unintended Acceleration

Vehicle was retrieved from Service Center after a center screen/computer replacement. Later that evening, when arriving at the destination at a residential neighborhood, I released the accelerator pedal and turned to approach the curb. **When the vehicle was next to the curb, it suddenly accelerated. I quickly applied the brake pedal and turned the wheel to steer away from the curb to avoid collision with a parked construction vehicle.** Video of the incident was captured with the Ring Doorbell camera and video footage is available.

In September 2018 NHTSA received another SUA complaint. #11124067 from Riverside, California, recounts unintentionally accelerating into the driver's garage door while attempting to park the car.

I was pulling into a driveway when my four week old Tesla Model 3, unexpectedly accelerated for no obvious reason. It felt like [the] car was flying at a high speed and I had no control. In a blurr, **we were surrounded by inflated airbags on all sides in a smoke filled car and I realized car had crashed into the garage door and now was pinned under a crumpled garage door.** In seconds, an everyday instance of pulling into the driveway had suddenly changed into a nightmare.

Later that same month NHTSA received complaint #11132177 from Simi Valley, California, which recounts two instances of unintended acceleration while parking.

Sudden Unexpected Acceleration

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Car was in a parking lot (both on August 12 2018 and on September 26 [2018] and coming to a stop.. **My foot was not on the accelerator but car jolted forward** approximately 10 feet.

One week later, NHTSA received another SUA report relating to a 2018 Tesla Model 3, this time from Lexington, Massachusetts.

On October 3rd, at 5:26pm, I entered the vehicle, stepped on the brake and shifted the car into D to pull forward out of a parking space (I backed in).

As I gently applied the accelerator pedal to ease forward (and turn left) out of the parking space to head down the parking aisle, the car moved forward much faster than expected so I let off the pedal. The vehicle stops accelerating after letting off the pedal. I try pressing the pedal gently again and the car lurches forward pretty quickly as if I depressed the pedal about halfway down (I did not). Letting go of the accelerator pedal didn't seem to kick in regenerative braking so I pressed on the brake to slow the car down to a speed appropriate for a parking lot.

After using the brake, the problem never reappeared and I resumed my drive although I was shaken a bit by the incident.

It's almost as if the "throttle map" was messed up for a few seconds asking the car to deliver much higher current than it should have at a 5-10% pedal position.

Complaint #11154123 from Upper Arlington, Ohio, was submitted to NHTSA in November 2018. The complaint reports unintentional acceleration into a tree.

Tesla Model 3 (2018) proceeded to accelerate while brake pedal was depressed going through an intersection causing uncontrollable maneuver and vehicle control loss. **The vehicle failed to respond to pedal input and failed to deploy airbags upon impact with a tree and fence continuing to accelerate throughout such incident.** Autopilot was engaged prior to crash. No forward collision warning activated.

NHTSA received another unintended acceleration crash report in late December 2018. The driver reports this as a self-park issue rather than a SUA problem, but Tesla denies self-park was activated, making this a SUA problem, judging from plain text reading of the complaint.

My Tesla Model 3 was so new that didn't even have the license plate yet. I've done self-park quite a few times, and even went to the sales center to confirm the way to engage self park. When the vehicle sense the space and you go reverse, the blue start button will be on so you can press and let the auto self park. Sadly, the self park caused the accident on 11/30/18 when I was on Lyon Street in San Francisco. When pressed on the reverse 'start' button, **the car went uncontrollably (like a demon was in the car)**

and hit the rear parked car. I could barely hit the brake in time to stop the zoomed reverse. This accident not only damaged my Model 3 and it hit the bumper and headlight of another parked vehicle, the incident truly traumatized me on the Tesla car functions. Thankfully, there was not any upcoming rear traffic, with the self reverse speed, the accident could be a lot worse. Tesla insisted that it is not an auto-pilot or self-park issue. They said we have to wait 4 weeks for the engineering review and report. After waiting for the Tesla report for 4 weeks, they claimed the vehicle was 'not' engaged in the 'self-park' function - well, why would the blue start button is available for me to believe that the self park was ready????? They made the excuse the creep function was activated. That is ridiculous! Your blue start button was available for self-park, driver would assume the vehicle is ready to be parked. Who would guess the vehicle would zoom back uncontrollably? Could you imagine how dangerous this is for all the self park drivers and passengers? The accident could be much worse. NHTSA must issue investigation and fining for such Tesla self park issue!

On January 4, 2019 NHTSA received a SUA complaint involving a 2018 Tesla Model 3 in Union City, California. Complaint #11165284 is lengthy and shares a litany of complaints, the relevant part of the text is transcribed below:

On local street on Mowry Avenue, between 6:30 pm and 7 pm, while driving, the car in front of us slowed down, removed the foot from the accelerator, car continue to accelerate, while the brake pedal was pressed. No collision warning, and car kept going until it ran into the next car and stopped.

We pulled over and assessed the damage, our car has small nick on the center of the bumper.

In March 2019 NHTSA received complaint #11196764 from Snelville, Georgia, recounting a SUA-caused injury crash while attempting to park.

Vehicle entered a shopping plaza at speed under 10mph and suddenly accelerated to high speed on it's own. It hit three stationary vehicles and knocked down a small tree. Tried stopping the car but the brakes would not work and the car finally stopped after hitting the third vehicle.

In April 2019 NHTSA received complaint #11202909 from Placitas, New Mexico which reports unintended acceleration while driving on autopilot.

The contact owns a 2018 Tesla Model 3. While driving with the cruise control set at approximately 67 mph, the vehicle independently accelerated to 75 mph. The failure occurred without warning. The contact was able to disengage the cruise control. A dealer was not contacted. The manufacturer was contacted and an engineer was sent to diagnose the vehicle. The engineer was unable to provide a cause for the independent

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

acceleration. The contact stated that the failure recurred several times. The vehicle was not repaired. The approximate failure mileage was 4,000.

Professor [REDACTED] [REDACTED] was driving home from teaching at [REDACTED] University in early May, 2018 when her Model 3 accelerated into the stone wall outside her home. She recounts the event to the NHTSA in complaint #11206155 from Atlanta, Georgia.

I turned into my driveway and was going to pull into my garage to park the car, when the car accelerated suddenly and violently and crashed into the front stone wall of our house. The stone wall is damaged and the front right side of the Tesla has significant damages.

A week later NHTSA received another SUA complaint from a Model 3 owner. Complaint #11207877 recounts sudden acceleration while stopped at a traffic light in San Diego, California.

My wife (driver for over 40 years, no accidents, no tickets) was stopped at a traffic light on a downgrade, foot on the brake, in our brand new Tesla Model 3 when it suddenly began to move forward and crashed into cars stopped at the light in front of her. My wife tried desperately to stop the Tesla with the brakes and emergency brake. [Our] car was stopped by the car in front. I hate to think of what could have happened had there not been car in front. We purchased the Tesla in December of 2018 and the crash occurred in February of 2019. After the crash I called Tesla, then I went to their showroom in San Diego, they referred me to TeslaLegal.com. So I asked my attorney to help. In the meantime, after the Tesla was released from the body shop it was sent to the Tesla Service Center in San Diego. Immediately, my attorney emailed ServiceHelpNA@Tesla.com for Tesla to preserve and provide the electronic driving record to determine what happened to the car. Service Center did not respond to our request. At this point Tesla definitely knows that we have a problem. Our attempts at contact began immediately after the crash in February. As of May 15th there is no contact yet. With the knowledge that I had an attorney, Tesla Service still sent me documents to sign. They recently sent me a text that they have updated firmware with the latest version and the car is safe to drive at this time. To me it sounds like they modified the Tesla. My attorney has called and emailed Tesla Service, Tesla Customer Service, Tesla Legal, and Tesla Headquarters in Fremont. She has written letters to all of the above and mailed them certified mail. In the letters she has explained that my wife and I are fearful of driving the car and definitely don't want anyone else to get killed. The Tesla sits in the Service Center storage.

In late May 2019 NHTSA received complaint #11209238 a Tesla SUA-crash report from McLean, Virginia.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

On April 24 [2019] Morning [REDACTED] (my wife) drove up multilevel parking lot at work [REDACTED] she initially chose a head in parking spot, then attempted to move the car forward to the next aisle, so the car would be facing front when she got out. The car picked up uncontrollable and extremely high speed and she felt out of control and could not move foot from accelerator to brake in split second, all she could do was to steer slightly to hit a pole at that next spot, and avoid going across drive lane and over the barricade to a drop. The car suffered severe front damage and airbags opened, she had minor bruise. Repair estimates caused insurance company to call it a total loss.

1. Tesla claims to be reviewing electronic data but has not released conclusions so far.
2. Why such high speed was picked up when all she wanted to do was crawl over to the next spot directly ahead (about 20 feet) from the previous spot.
3. Why various electronic system, front collision warning, front collision avoidance, video sensors about obstructions, avoidance based acceleration control etc, failed to apply any speed reductions.

Photos of event, estimate from insurance are enclosed.

I request your kind attention, and your analysis as to the safety failures.

The 2018 Tesla Model 3 is particularly vulnerable to SUA failures, and this petition provides enough evidence for NHTSA to begin an investigation of this problem with 2018 Tesla Model 3 and all other Tesla-made vehicles.

2019 Tesla Model 3

Already in 2019 there are several reports of SUA in the 2019 Tesla Model 3. Anecdotal evidence suggests that the same SUA problems which plague the other Tesla-made vehicles are present in this vehicle as well.

Table 11 - 2019 Model 3 Complaints, by Complaint Date

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model 3	2019	11206931	5/10/2019	Stopped At Traffic Light	California, Valencia	1
Model 3	2019	11231846	7/15/2019	Parking	Maryland, Columbia	0
Model 3	2019	11241215	7/26/2019	Driving	California, San Jose	1

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

The first 2019 Tesla Model 3 SUA report was submitted to NHTSA as complaint #11206931 from Valencia, California. The driver recalls being stopped at a traffic light when their vehicle suddenly accelerated, causing an injury-accident.

I was stopped at a red light, second in line. **My car lunged backwards hitting the car behind me. I had done nothing to move the vehicle.** There was slight damage to my rear end and their front end. My neck did whiplash. **There was an infant in the backseat who was injured in the other car.** The driver of the other car was not injured.

Please call me (Phone Number Redacted).

On July 15, 2019, the NHTSA received a complaint from a Model 3 owner in Columbia, Maryland. Complaint #11231846 reports another SUA-crash while parking.

My Tesla Model 3 just suddenly accelerated as I was turning right [into] the lot to park the car. My car hit the wall and then the hazard light came on.

██████████ submitted the most recent Tesla SUA report in the NHTSA database. Discussed in the cover letter to this petition, complaint #11241215 made on August 1, 2019 recounts the story of a multi-vehicle accident following unintended acceleration from a stop light:

My car was five weeks old. While I was driving home on my commute I realize the screen had froze, and then suddenly blacked out. I thought it was a software update as I am a family that owns Tesla, but it wasn't because suddenly the ability to steer and break [was] compromised and the car had sped without any indication as to why. I reported it to Tesla and the earliest they could set for an appointment [was] several weeks later. Within one week of this incident initially occurring, this happened again during traffic and my car instead of breaking, increased tremendously and smashed into a car in front of me. I had contacted Tesla letting them know that the first time this happened I was very lucky because I wasn't on the highway, but 95% of my commute is on major highways in the Bay Area. I said this could be dangerous and I really think this needs to be looked up faster, I got zero response. So when this happened there was absolutely nothing I could do and I rolled and sprained my ankle very aggressively. Not only that but all of the airbags in the entire car malfunctioned even though I was able to focus the brunt of the damage to the right front. Unfortunately one of the back windows didn't open nor did the passenger lower airbag. There was no one in the passenger seat but if there was that would have not gone off and that's not OK. There was no reason for this to happen and there were no updates on software that needed to happen and the car was five weeks old. Tesla has refused to provide me with their data and I have an SSD that shows my car shut down.

Tesla has since been uncooperative with ██████████ including by denying her access to her vehicle data.

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Conclusion

Tesla vehicles experience unintended acceleration at rates far exceeding other cars on the road. The volume of complaints in the NHTSA database indicates a severe and systemic malfunction within Tesla vehicles. Because Tesla has exclusive access to all Tesla vehicle data, Tesla must know of this defect.

I hereby petition the NHTSA to investigate sudden unintended acceleration in Tesla vehicles initiate a full recall of these vehicles. If NHTSA finds evidence of a systemic problem within Tesla vehicles relating to Sudden Unintended Acceleration, I further petition the NHTSA to NHTSA determine when Tesla became aware of this defect in their vehicles.

Appendix A: Control Group Data

I looked for similar unintended acceleration complaints from among a group of vehicles produced from 2013 - 2018. I used the same methodology discussed in the preceding pages.

Car	SUA Complaints	Production Total (EWR Number)	Years on Street, Approximate	Car Years, Approximate	Car Years per SUA Report, Approximate	SUA Reports per 100,000 Car Years
2013 Land Rover LR4 ⁵⁰	1	7294	6	43764	43764	2.284983091
2013 Lexus RX 350 ⁵¹	7	118,993	6	713958	101994	0.9804498304
2013 Nissan Leaf ⁵²	3	26,098	6	156588	52196	1.915855621
2014 Ford Explorer ⁵³	4	209,112	5	1045560	261390	0.382570106
2014 Mercedes E Class ⁵⁴	2	82,118	5	410590	205295	0.4871039236

⁵⁰ 2013 Land Rover LR4 NHTSA Complaint #11099240

⁵¹ 2013 Lexus RX350 NHTSA Complaints #11139529, #10919473, #10897034, #10819572, #10809525, #10644866, #10648642

⁵² 2013 Nissan Leaf NHTSA Complaints #11010132, #10734251, #10705011

⁵³ 2014 Ford Explorer Complaints #11034228, #10992657, #10956959, #10789299

⁵⁴ 2014 Mercedes Benz E-Class NHTSA Complaints #10914900, #10716054

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

2015 BMW M3 ⁵⁵	0	3377	4	13508	N/A	0
2015 Cadillac Escalade ⁵⁶	1	28,173	4	112692	112692	0.8873744365
2015 Nissan Pathfinder ⁵⁷	0	91,823	4	367292	N/A	0
2015 Toyota Prius V ⁵⁸	8	22,655	4	90620	11327.5	8.828073273
2016 Chevrolet Volt ⁵⁹	1	8945	3	26835	26835	3.726476616
2016 Dodge Dart ⁶⁰	2	63,756	3	191268	95634	1.04565322
2016 Mercedes C Class ⁶¹	2	80,152	3	240456	120228	0.8317530026
2017 Alfa Romeo Giulia ⁶²	1	8648	2	17296	17296	5.781683626
2017 Chevrolet Bolt ⁶³	2	26,686	2	53372	26686	3.74728322
2018 Ford Focus ⁶⁴	1	123,592	1	123592	123592	0.8091138585
2018 Ford Fusion ⁶⁵	1	108,825	1	108825	108825	0.9189065013
2018 Honda Clarity PHV ⁶⁶	2	24,310	1	24310	12155	8.227067051
2018 Toyota Camry HEV ⁶⁷	0	27,493	1	27493	N/A	0
2018 Toyota	3*	401,910	1	401910	133970	0.7464357692

⁵⁵ No SUA Complaints Found for 2015 BMW M3

⁵⁶ 2015 Cadillac Escalade Complaint #10716407

⁵⁷ No SUA Complaints Found for 2015 Nissan Pathfinder

⁵⁸ 2015 Toyota Pius V NHTSA Complaints #11219137, #11139230, #11013735, #10888762, #10745911, #10821739, #11021602, #10723794

⁵⁹ 2016 Chevrolet Volt Complaint #10906933

⁶⁰ 2016 Dodge Dart Complaints #11204734, #11083392

⁶¹ 2016 Mercedes Benz C-Class Complaints #10907333, #10958226

⁶² 2017 Alfa Romeo Giulia NHTSA Complaint #11023575

⁶³ 2017 Chevrolet Bolt NHTSA Complaints #11219219, #11082444

⁶⁴ 2018 Ford Focus NHTSA Complaint #11171466

⁶⁵ 2018 Ford Fusion NHTSA Complaint #11143804

⁶⁶ 2018 Honda Clarity PHV NHTSA Complaints #11144940, 11118738

⁶⁷ No SUA Complaints Found for 2018 Toyota Camry HEV

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Camry SIF ⁶⁸						
Totals / Averages	41	1,463,960		4,169,929	101,705.5854	0.9832301701

*One 2018 Toyota Camry SIF consumer complained to NHTSA three times, only one complaint is counted.

Appendix B: Tesla Data

Cars	SUA Complaints	Production Total (EWR Number)	Years on Street, Approximate	Car Years, Approximate	Car Years per SUA Report, Approximate	SUA Reports per 100,000 Car Years
2012 Model S	0	2975	7	20825	N/A	0
2013 Model S	12	17833	6	106998	8916.5	11.2151629
2014 Model S	5	17867	5	89335	17867	5.596910505
2015 Model S	16	24361	4	97444	6090.25	16.4196872
2016 Model S	10	28413	3	85239	8523.9	11.73171905
2016 Model X	16	17709	3	53127	3320.4375	30.11651326
2017 Model 3	0	2870	2	5740	N/A	0
2017 Model S	15	27195	2	54390	3626	27.57859901
2017 Model X	6	17138	2	34276	5712.666667	17.50495974
2018 Model 3	15	145406	1	145406	9693.733333	10.31594295
2018 Model S	6	27296	1	27296	4549.333333	21.98124267
2018 Model X	5	23622	1	23622	4724.4	21.166709
2019 Model 3	3	22111	0.5	11055.5	3685.166667	27.13581475

⁶⁸ 2018 Toyota Camry SIF NHTSA Complaints #11152878, #11130986, #11130548

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

2019 Model S	0	2527	0.5	1263.5	N/A	0
2019 Model X	0	2382	0.5	1191	N/A	0
Model 3 Total	18	170387	N/A	162201.5	9011.194444	11.09730798
Model S Total	64	148467	N/A	482790.5	7543.601563	13.25626747
Model X Total	27	60851	N/A	112216	4156.148148	24.06074
Tesla Total	109	379705		757208	6946.862385	14.3949879

Appendix C: Tesla SUA Complaints to NHTSA

Tesla Model	Year	NHTSA #	Complaint Date	Parking/Driving	Location	Injuries
Model S	2013	10545488	9/26/2013	Parking	California, Laguna Hills	0
Model S	2013	11156706	12/7/2018	Stopped at Stop Sign	California, Milpitas	0
Model S	2013	10839579	3/2/2016	Parking	California, Pleasanton	0
Model S	2013	10749575	8/18/2015	Parking	California, Rancho Santa Fe	0
Model S	2013	10545230	9/24/2013	Parking	California, San Diego	0
Model S	2013	10958834	3/6/2017	Parking	California, San Jose	0
Model S	2013	11082114	3/30/2018	Parking	California, San Ramon	0
Model S	2013	10758893* & 10758908	8/24/2015	Parking	California, Thousand Oaks	0
Model S	2013	11180431	2/15/2019	Parking	Colorado, Castle Rock	1
Model S	2013	10562266	1/30/2014	Driving	New Jersey, Cinnaminson	0
Model S	2013	11081382	3/26/2018	Stationary	Oregon, McMinnville	0
Model S	2013	11065308	1/26/2018	Parking	Texas, San Antonio	0

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model S	2014	10639935 & 10639849	9/29/2014	Parking	California, Bakersfield	1
Model S	2014	10845619	3/8/2016	Red Light	California, Silverado	0
Model S	2014	10836289	2/15/2016	Driving (Inside Housing Compound)	China, Hangzhou	0
Model S	2014	10723925	5/22/2015	Red Light	Florida, Gainesville	1
Model S	2014	10982961	5/1/2017	Parking	Florida, West Palm Beach	1
Model S	2014	11139174	10/9/2018	Parking	Washington, Kirkland	0
Model S	2015	10910065	9/27/2016	Parking	Arizona, Tucson	1
Model S	2015	10968322	3/24/2017	Parking	California, La Verne	0
Model S	2015	10979378	4/19/2017	Stopped At Traffic Light	California, Laguna Woods	0
Model S	2015	11132094	9/28/2018	Parking	California, Los Angeles	0
Model S	2015	10846206	3/1/2016	Driving	California, San Francisco	0
Model S	2015	10874744	6/17/2016	Parking	California, San Jose	0
Model S	2015	10995382	6/15/2017	Driving	Colorado, Denver	2
Model S	2015	10764853	9/17/2015	Parking	Illinois, Lake Forest	0
Model S	2015	10875699	6/21/2016	Parking	Illinois, West Chicago	0
Model S	2015	11220202	6/14/2019	Driving	Illinois, Westmont	0
Model S	2015	10864353	5/11/2016	Parking	Louisiana, Denham Springs	0
Model S	2015	11078571	3/11/2018	Parking	Michigan, Ann Arbor	0
Model S	2015	10862194	4/29/2016	Parking	New York, New City	0
Model S	2015	11171052	1/20/2019	Parking	North Carolina, Chapel Hill	0
Model S	2015	10810457	12/15/2015	Parking	Texas, Coppell	0
Model S	2015	11075212	2/27/2018	Unknown	Texas, Houston	0
Model S	2016	11079500	3/15/2018	Parking	Arkansas, Rogers	0
Model S	2016	11118541	8/8/2018	Parking	California, Laguna Niguel	0
Model S	2016	10949955	2/6/2017	Driving	California, Mountain View	2
Model S	2016	10953656	2/9/2017	Parking	California, Pasadena	3
Model S	2016	11000077	3/30/17	Stationary - Parked	California, San Jose	0

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model S	2016	11066047	1/31/2018	Parking	Florida, Miami Beach	0
Model S	2016	11100721	6/9/2018	Parking	Hawai'i, Honolulu	0
Model S	2016	10864163*	5/10/2016	Parking	Maryland, Frederick	0
Model S	2016	11042211*	11/1/2017	Parking	Texas, Desoto	0
Model S	2016	11054973	12/15/2017	Parking	Washington, Olympia	0
Model X	2016	10873117	6/7/2016	Parking	California, Anaheim	1
Model X	2016	10995447	6/16/2017	Parking	California, Cupertino	0
Model X	2016	10970822	4/5/2017	Parking	California, Dublin	0
Model X	2016	11083342	4/4/2018	Parking	California, Los Angeles	1
Model X	2016	11118315	8/7/2018	Driving	California, Rancho Palos Verdes	0
Model X	2016	10915633	10/12/2016	Parking	California, Santa Clara	0
Model X	2016	10939234	1/3/2017	Parking	California, Santa Clara	0
Model X	2016	10893066	8/4/2016	Parking	Connecticut, Danbury	0
Model X	2016	10898260	8/24/2016	Parking	Florida, Ormond Beach	0
Model X	2016	10957394	2/27/2017	Parking	Georgia, Marietta	1
Model X	2016	10908051	9/19/2016	Parking	Massachusetts, Boston	0
Model X	2016	10909588	9/26/2016	Parking	Massachusetts, Lexington	0
Model X	2016	11096621	5/17/2018	Parking	Massachusetts, Lynnfield	0
Model X	2016	10935272	12/14/2016	Parking	New York, Amagansett	1
Model X	2016	11003716	7/7/2017	Parking	Texas, South Lake	2
Model X	2016	10910108	9/27/2016	Parking	Unknown	1
Model S	2017	11189710	3/18/2019	Parking	California, Fallbrook	1
Model S	2017	11113560	7/25/2018	Parking	California, Laguna Niguel	0
Model S	2017	11121147	8/20/2018	Parking	California, Los Altos	0
Model S	2017	11065563	1/28/2018	Parking	California, Newport Beach	3
Model S	2017	11229124	7/3/2019	Parking	California, Palm Desert	2
Model S	2017	11064628	1/24/2018	Parking	California, San Jose	0

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model S	2017	11074547 & 11078440	2/23/2018	Stopped at Traffic Light	California, Santa Barbara	0
Model S	2017	11093835	5/15/2018	Stopped At Traffic Light	California, Santa Clara	0
Model S	2017	11015893	8/14/2017	Parking	Florida, Coral Gables	0
Model S	2017	11098517	5/29/2018	Parking	Florida, Naples	0
Model S	2017	11162968*	12/21/2018	Parking	Nevada, Henderson	1
Model S	2017	11089262	4/21/2018	Parking	New Jersey, Paramus	0
Model S	2017	11174732	2/6/2019	Driving	New Jersey, North Bergen	1
Model S	2017	11021371	9/4/2017	Parking	New York, Bronxville	0
Model S	2017	11048161	11/23/2017	Parking	Washington, Bellevue	0
Model X	2017	11076619	3/7/2018	Parking	Arizona, Phoenix	0
Model X	2017	11073274	2/16/2018	Parking	California, Arcadia	0
Model X	2017	11102931	6/21/2018	Parking	California, Concord	0
Model X	2017	11112860	7/21/2018	Parking	California, Danville	3
Model X	2017	11083755	4/7/2018	Parking	California, San Jose	1
Model X	2017	11128789	9/11/2018	Parking	Utah, Lindon	0
Model 3	2018	11091970	5/4/2018	Parking	Arizona, Chandler	0
Model 3	2018	11097159	5/22/2018	Parking	Arizona, Phoenix	0
Model 3	2018	11164094	12/30/2018	Parking	California, Burlingame	0
Model 3	2018	11124067	9/2/2018	Parking	California, Riverside	0
Model 3	2018	11207877	5/15/2019	Stopped At Traffic Light	California, San Diego	0
Model 3	2018	11119991	8/14/2018	Parking	California, San Francisco	0
Model 3	2018	11132177	9/28/2018	Parking	California, Simi Valley	0
Model 3	2018	11165284	1/4/2019	Driving	California, Union City	0
Model 3	2018	11092830	5/10/2018	Parking	Delaware, Dover	0
Model 3	2018	11206155	5/7/2019	Parking	Georgia, Atlanta	0
Model 3	2018	11196764	3/30/2019	Parking	Georgia, Snellville	1
Model 3	2018	11133222	10/3/2018	Parking	Massachusetts, Lexington	0

Motor Vehicle Defect Petition to Recall All Tesla Vehicles Due to Sudden Unintended Acceleration

Model 3	2018	11202909	4/22/2019	Driving	New Mexico, Placitas	0
Model 3	2018	11154132	11/26/2018	Driving	Ohio, Upper Arlington	0
Model 3	2018	11209238	5/22/2019	Parking	Virginia, McLean	0
Model S	2018	11100216	6/6/2018	Parking	California, Near Buena Park	1
Model S	2018	11183545	3/1/2019	Parking	California, Palo Alto	0
Model S	2018	11102347	6/18/2018	Driving	California, San Diego	1
Model S	2018	11155579	12/3/2018	Parking	California, Walnut	1
Model S	2018	11209483	5/23/2019	Parking	Minnesota, Maple Grove	2
Model S	2018	11228597	7/1/2019	Parking	Minnesota, Plymouth	0
Model X	2018	11183334	3/1/2019	Parking	California, Pleasanton	0
Model X	2018	11154380	11/27/2018	Driving	California, San Clemente	1
Model X	2018	11092528	5/8/2018	Parking	California, Tustin	1
Model X	2018	11142282	10/23/2018	Parking	Florida, Tampa	0
Model X	2018	11111431	7/15/2018	Parking	Washington, Seattle	0
Model 3	2019	11241215	7/26/2019	Driving	California, San Jose	2
Model 3	2019	11206931	5/10/2019	Stopped At Traffic Light	California, Valencia	2
Model 3	2019	11231846	7/15/2019	Parking	Maryland, Columbia	0

*Complaints relating to more than one SUA-accident or SUA-event involving same vehicle.