

# TOYOTA

## TOYOTA MOTOR NORTH AMERICA, INC.

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February 17, 2010

Mr. Daniel C. Smith  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: 10V-017  
Certain Toyota Vehicle Accelerator Pedal Assembly Issue  
Part 573, Defect Information Report

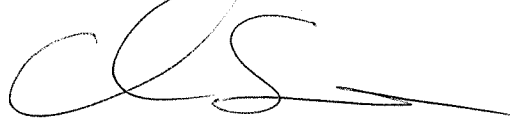
Dear Mr. Smith:

In accordance with the requirements of the National Traffic and Motor Vehicle Safety Act of 1966 and 49 CFR Part 573, on behalf of Toyota Motor Corporation ["TMC"], we hereby submit the attached amended Defect Information Report concerning a voluntary safety recall of certain Toyota Tundra, Sequoia, Avalon, Camry, Corolla, Matrix, RAV4, Highlander, and Pontiac Vibe vehicles. Please see the attached document for a correction that adds an additional 37 vehicles to the affected vehicle range.

Should you have any questions about this report, please contact me at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.



Chris Santucci  
Manager  
Technical & Regulatory Affairs

## DEFECT INFORMATION REPORT

1. Vehicle Manufacturer Name:

Toyota Motor Manufacturing, Indiana, Inc. ["TMMI"]  
4000 South Tulip Tree Drive, Princeton, IN 47670-4000

Toyota Motor Manufacturing, Texas, Inc. ["TMMTX"]  
1 Lone Star Pass San Antonio, Texas 78264-3413

Toyota Motor Manufacturing Kentucky, Inc. ["TMMK"]  
1001 Cherry Blossom Way, Georgetown, KY 40324

Toyota Motor Manufacturing Canada Inc. ["TMMC"]  
1055 Fountain Street North, Cambridge, Ontario, Canada N3H 5K2

New United Motor Manufacturing, Inc. ["NUMMI"]  
45500 Fremont Boulevard Fremont, CA 94538-6368

Subaru of Indiana Automotive, Inc. ["SIA"]  
5500 State Road 38 East, Lafayette, Indiana 47905

Affiliated U.S. Sales Company

Toyota Motor Sales, USA, Inc. ["TMS"]  
19001 South Western Avenue, Torrance, CA 90509

General Motors Company ["GM"]  
100 Renaissance Center Drive, PO. Box 100 Detroit, MI 48265

Component Containing Defect

Accelerator Pedal Assembly containing a Friction Lever made of PPS or PA46 materials  
CTS Corporation  
80 Thomas Street, Streetsville, ON. L5M1Y9

2. Identification of Affected Vehicles:

Based on production records, we have determined the affected vehicle population as in the table below.

Make/ Car Line	Model Year	Manufac- turer	VIN		Production Period
			VDS	VIS	
Toyota Tundra	2007 - 2008	TMMI	##5#1	S449764-S524251	Jan. 4.2007 -Aug. 7.2008
	2007 - 2010	TMMTX	##5#1	X001001-X129151	Oct. 26.2006 -Jan. 21.2010
Toyota Sequoia	2008 - 2010	TMMI	#####	S000010-S032719	Nov. 14.2007 -Jan. 26.2010
Toyota Avalon	2005 - 2010	TMMK	BK3#B	U001003-U367444	Sep. 17.2004 -Jan. 18.2010
Toyota Camry	2007 - 2010	TMMK SIA	B###K	U001001-U919800 R001003-R139848	Oct. 7.2005 - Jan. 22.2010
Toyota Corolla	2009 2010	TMMC NUMMI	B#4#E	Z001001-Z337444 C001043-C348040	Jan. 2.2008 -Jan. 22.2010
Toyota Corolla Matrix	2009 2010	TMMC	##4#E	C001017-C348047	Jan. 2.2008 -Jan. 22.2010
Toyota RAV4	2009 2010	TMMC	#####V	W001048-W038047	Oct. 27.2008 -Jan. 25.2010
Toyota Highlander	2010	TMMI	##3EH	S001019-S013869	Sep. 16.2009 -Jan. 26.2010
Pontiac Vibe	2009 2010	NUMMI	S#6##	Z400002-Z478598	Jan.7.2008 -Aug.17.2009

Note: Although the involved vehicles are within the above VIN ranges, not all vehicles within these ranges were sold in the U.S.

3. Total Number of Vehicles Potentially Affected:

Toyota Tundra:	426,331
Toyota Sequoia:	50,316
Toyota Avalon:	329,781
Toyota Camry:	786,307
Toyota Corolla:	490,009
Toyota Corolla Matrix:	74,725
Toyota RAV4:	53,232
Toyota Highlander:	19,960
Pontiac Vibe:	70,806
Total:	2,301,467

4. Percentage of Vehicles Estimated to Actually Experience Malfunction:

Unknown

5. Description of Problem:

Due to the manner in which the friction lever interacts with the sliding surface of the accelerator pedal inside the pedal sensor assembly, the sliding surface of the lever may become smooth during vehicle operation. In this condition, if condensation occurs on the surface, as may occur from heater operation (without A/C) when the pedal assembly is cold, the friction when the accelerator pedal is operated may increase, which may result in the accelerator pedal becoming harder to depress, slower to return, or, in the worst case, stuck in a partially depressed position. In addition, some of the affected vehicles' pedals were manufactured with friction levers made of a different material (PA46), which may be susceptible to humidity when parked for a long period in hot temperatures. In this condition, the friction when the accelerator pedal is operated may increase, which may result in the accelerator pedal movement becoming rough or slow to return. In light of the similarity with the aforementioned issue, Toyota has decided to include these vehicles in the defect determination.

6. Chronology of Principal Events:

March 2007 – June 2008

Starting in March 2007, Toyota received field technical information of reports of accelerator pedals demonstrating symptoms such as rough operation or being slow to return to the idle position. These reports were limited to one model (Tundra) and the accelerator pedal assemblies in those vehicles contained a friction lever made of the PA46 material. Toyota's investigation found that the PA46 material was susceptible to humidity, such as when the vehicle was parked for a long period in hot temperatures. This could cause the friction lever to absorb moisture and swell. Environmental testing was conducted in order to understand the full impact of the swelling of the friction lever due to humidity. In February 2008, the material of the friction arm was changed to PPS while investigations continued. In June 2008, Toyota concluded that while accelerator pedal feeling could change under certain conditions, Toyota considered it to be a drivability issue unrelated to safety.

December 2008 – August 2009

Toyota received field technical information from the European market which indicated reports of the accelerator pedal sticking on predominantly right hand drive Toyota Aygo and Yaris vehicles. The subject accelerator pedals used in Europe used the PPS material only. Toyota began a detailed investigation with an evaluation of returned accelerator pedals in March 2009. Internal inspection of the sliding surface of the friction lever and the pedal arm was found to be partially smooth. Toyota conducted some duplication tests, and it was found that the internal friction could increase if moisture was attached to the sliding surface of the friction lever as the surface became smooth. This made the accelerator pedal stick in a partially depressed position under the condition where condensation occurs on the accelerator pedal (i.e. for several minutes during heater operation after the engine is started in cold temperatures). In addition, in the condition where A/C is operated, the phenomenon did not occur. At this time, it appeared to be a phenomenon predominantly limited to right hand drive vehicles,

without A/C equipment, based on the location of the accelerator pedal and the heater duct. Based on the investigation results above, Toyota lengthened the arm of the friction lever and changed its material to prevent smoothing on all vehicles produced in Europe with the subject accelerator pedals starting in mid-August 2009.

#### October 2009 – January 2010

Toyota received field technical information from the U.S. and Canadian markets which indicated reports of sticking accelerator pedals had occurred. Toyota recovered parts in order to evaluate the phenomenon. The returned accelerator pedals have the same material friction lever as previously used in the European models (PPS) and, as a result of the internal investigation, Toyota decided to conduct a voluntary safety recall of all vehicles with the subject accelerator pedals. This recall will include vehicles equipped with friction levers made with PPS material, as well as with the PA46 material, which was associated with the rough operation or slow to return symptoms.

#### 7. Description of Corrective Repair Action:

All known owners of the subject vehicles (except the Pontiac Vibe) will be notified by first class mail to return their vehicles to a Toyota dealer for a installation of a reinforcement bar in the accelerator pedal which will allow the pedal to operate smoothly.

Owners of Pontiac Vibe identified above, will be notified by first class mail to return their vehicles to a GM dealer for an installation of a reinforcement bar in the accelerator pedal which will allow the pedal to operate smoothly.

#### Reimbursement Plan for pre-notification remedies for Toyota Vehicles (Toyota Tundra, Toyota Sequoia, Toyota Avalon, Toyota Camry, Toyota Corolla, Toyota Corolla Matrix, Toyota RAV4, Toyota Highlander)

The owner letter will instruct vehicle owners that have had their accelerator pedal replaced for a similar condition prior to this campaign to seek reimbursement by mailing a copy of their repair order, proof-of-payment, and proof-of-ownership for reimbursement consideration.

- (i) The beginning date of the Toyota reimbursement plan will be:  
The reimbursement plan will cover repairs made no earlier than January 4, 2005, when the first vehicles were manufactured.
- (ii) The ending date of Toyota reimbursement plan will be:  
The ending date shall be at least 10 calendar days after the date on which the last owner notification was mailed, however Toyota will further review requests for reimbursement from involved vehicle owners on a case-by-case basis.
- (iii) Toyota may exclude reimbursement, if:
  - a. the pre-notification repair was not of the same type (repair, replacement, or refund of purchase price) as the recall remedy;
  - b. the pre-notification repair was not reasonably necessary to correct the defect or noncompliance that led to the recall or a manifestation of the defect or noncompliance;
  - c. the pre-notification remedy was not reasonably necessary to correct the defect or noncompliance; or;

- d. the repair was conducted as a result of vehicle accident, debris or another reason not specifically related to the defect or noncompliance.
- (iv) Toyota will reimburse eligible customers for at least the cost of the accelerator pedal and the replacement labor. Other costs may be reimbursed on a case-by-case basis.
- (v) Owners requesting reimbursement must submit the appropriate documentation: repair order, reason for replacement, proof-of-payment, and proof-of-ownership to Toyota for reimbursement consideration.

Reimbursement Plan for pre-notification remedies for General Motors Vehicles (Pontiac Vibe)

Pursuant to 577.11(e), General Motors will provide reimbursement to owners for repairs completed on or before ten days after GM mails owner letters, pursuant to the plan submitted on January 22, 2009.

8. Recall Schedule:

Toyota's mailing of the owner notifications will commence in early February and be completed in late April 2010.

Copies of the owner notification and dealer instructions will be submitted as soon as they are available.

After Toyota supplies the required information (owner letter and part availability), General Motors will notify NHTSA separately of its owner mailing schedule and supply a copy of the owner letter.

9. Distributor/Dealer Notification Schedule:

Toyota's notifications to distributors/dealers will be sent in early February 2010.

After Toyota supplies the required information (dealer instructions and part availability), General Motors will notify NHTSA separately of its dealer mailing schedule and supply a copy of the dealer bulletin.