Response to Paragraph 47

Toyota has enlisted Stericycle to assist in the analysis and determination of 17V-006 vehicles eligible to be removed from recall outreach efforts as they migrate through the used vehicle market and end-of-life market.

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The following is an outline of the program:

- The enhanced Scrap Salvage Export (SSE) evaluation utilizes a series of databases to perform an analysis to identify "total removed" and "in-commercial transit" vehicle status as described further below. The main data aggregators used are the National Salvage Vehicle Reporting Program (NSVRP) and the National Motor Vehicle Title Information System (NMVTIS).

- More than 24 different databases consisting primarily of NMVTIS, NSVRP, and other multiple aftermarket databases are accessed, compiled, and analyzed to determine total removed and in-commercial transit status. The information is integrated in a "master picture" for each vehicle, aligning the data into a chronological order of activity that ultimately determines the status of each vehicle.

- There are more than 10 different databases that NSVRP maintains or dynamically accesses to compile the various flows for in-commercial activity. To more fully assess a vehicle's status, NSVRP time-orders and integrates this information with the NMVTIS title and brand information for each vehicle.

- In addition, there are multiple "total removed" databases, including multiple export related databases, several impound databases, stolen vehicle and multiple salvage databases, NMVTIS and others. These are all integrated, cross-checked, and time-ordered to confirm which, if any, of the data elements may supplant the value of an earlier status – or where the earlier status is relevant to the current condition of a vehicle for purposes of the recall reporting.

The specific identification information is used to evaluate the VIN population into the following segments and are defined as follows:

"Total Removed" Designations

- Vehicles that have been branded by a state with a final branding as a junked/crushed/dismantled/or non-repairable designation.
- Vehicles that have been reported into the NMVTIS with a status of crush or scrap, indicating that the vehicle has been reported as already physically decommissioned as an operating vehicle.
- Vehicles not otherwise reported into NMVTIS that have been processed through salvage facilities and have been documented in their internal records as crushed/scrapped.
- Vehicles which have been sold through a salvage auction and where the physical damage is so severe that the vehicle cannot be put back into service.
- Vehicles that have been exported outside of the U.S. and its territories, regardless of their condition.
- Vehicles known to be presently registered outside of the U.S.
- Vehicles that are active stolen vehicles and cannot be located.
- A review of salvage auction records and auction photos are included to determine when passenger and driver airbags are deployed and will be identified as "total removed" for purposes of that airbag recall.

In-Commercial Transit

- Vehicles are identified that are no longer in the possession of the last recorded registered owner, and where the vehicle has subsequently been handled by an identified intermediate party (wholesale-used car or salvage auctions) who does not have an obligation to re-register the vehicle in their own name. These vehicles are capable of resurfacing once they complete the commercial transfer chain and end up with a final buyer or owner. In-commercial transit analysis can provide leads to outreach to current owners even when they are not recorded with a state as the registered owners of the vehicles.

Based on this extensive SSE Analysis, Toyota intends to make an adjustment to 17V-006 as follows:

17V-006 Population	543,326
"Total Removed"	- 6,275
"Others"	- 13,226

17V-006 Population Adjusted =523,825