

TOYOTA

Toyota Motor North America, Inc.

Vehicle Safety & Compliance
Liaison Office
Mail Stop: W4-2D
6565 Headquarters Drive
Plano, TX 75024

June 10th, 2019

Mr. Jeffrey Giuseppe
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Recall Management Division (NEF-100)
1200 New Jersey Ave, SE
Washington, D.C. 20590

Re: Third Amendment to the Coordinated Remedy Order (Paragraph 47)
18V-024

Dear Mr. Giuseppe:

This is in reference to the Agency's December 9, 2016 Third Amendment to the Coordinated Remedy Order. Toyota is submitting the enclosed document as its notice to utilize the "other" reporting category pursuant to Paragraph 47 and the provisions and requirements set forth in Paragraph 45.

The attached information is current as of May 14, 2019 and will be reflected in Toyota's monthly dashboard submission on July 5, 2019.

In connection with this notice, Toyota will inform the Agency of its response to Paragraph 48 under separate cover by e-mail.

Should you have any questions about Toyota's response, please contact me directly.

Sincerely,

A handwritten signature in black ink that reads "Cory Hoffman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cory Hoffman
General Manager
Vehicle Safety & Compliance Liaison Office
Toyota Motor North America, Inc.

Enclosures:

- (1) Response to Paragraph 47
- (2) IHS Markit – Out of Transit Business Rules

Cc:

Stephen Ridella, Director, Office of Defects Investigation
Kara Fischer, Office of Chief Counsel
Stephen Hench, Office of Chief Counsel
Josh Neff, Recall Management
John Buretta, Takata Independent Monitor

Response to Paragraph 47

Toyota has enlisted IHS Markit to assist in the analysis and determination of 18V-024 vehicles eligible to be removed from recall outreach efforts as they migrate through the used vehicle market and end-of-life market.

Company Information:

IHS Markit

Contact:

Ms Kelly Warren – Sr Sales Engineer

(562) 505-7910

Kelly.Warren@ihsmarkit.com

The following is an outline of the program:

#	Out of Transit Type	Rules
1	Export	<ol style="list-style-type: none">1. Compare VINs to Export, Carfax Recent Activity, and Government (U.S. and Canada) recent activities to identify VIN as 'Export' and considered as Out of Transit in U.S.2. If the Export date is considered more recent than the U.S. Government transaction date and there is no U.S. Carfax activity (Service, Dealer, Inspection, Title) that is considered more recent than the Export date, the VIN will be flagged as Out of Transit with a category of 'Export'.3. If the country associated with the Export is Canada and the activity date is considered more recent than the U.S. Government transaction date, the VIN will be flagged as Out of Transit with a category of 'Export'.4. If the Canadian registration date is considered more recent than the U.S. Government transaction date and there is no Carfax activity (Service, Dealer, Inspection, Title) within the U.S. that is considered more recent than the Canadian registration date, the VIN will be flagged as Out of Transit with a category of 'Export'.
2	Scrapped	<ol style="list-style-type: none">1. Compare VINs to U.S. Government Branded Title recent activities to identify VIN as 'Scrapped' and considered as Out of Transit in U.S.2. If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Scrapped':<ol style="list-style-type: none">a. VIN is identified as Junk, Dismantled or Salvage.b. Current owner is classified as an insurance or salvage organization.3. If a VIN is Rebuilt or Reconstructed the Out of Transit flag will be removed or not applied as appropriate. Rebuilt and Reconstructed titles take precedence when any of the Branded titles listed above for a VIN are received on the same day as the Rebuilt or Reconstructed title.
3	Stolen	<ol style="list-style-type: none">1. Compare VINs to U.S. Government Branded Title recent activities to identify VIN as 'Stolen' and considered as Out of Transit in U.S.2. If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Stolen':<ol style="list-style-type: none">a. VIN is identified as Stolen for the current owner.

		3. If a VIN is Recovered Stolen the Out of Transit flag will be removed or not applied as appropriate. Recovered Stolen titles take precedence when the Stolen title for a VIN is received on the same day as the Recovered Stolen title.
4	Salvage	<p>1. Compare VINs to U.S. Government Branded Title recent activities to identify VIN as 'Salvage' and considered as Out of Transit in U.S.</p> <p>2. If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Salvage':</p> <ul style="list-style-type: none"> a. VIN is identified as Junk, Dismantled, or Salvage for the current owner. b. VIN is not flagged as Out of Transit with a category of 'Scrapped'. <p>3. If a VIN is Rebuilt or Reconstructed the Out of Transit flag will be removed or not applied as appropriate. Rebuilt and Reconstructed titles take precedence when any of the Branded titles listed above for a VIN are received on the same day as the Rebuilt or Reconstructed title.</p>
5	Other	<p>1. No recent activity of the VIN (excludes VINs of non-expiring State, Plate and Government owner classification). If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Other Out of Transit':</p> <ul style="list-style-type: none"> a. VIN is 5 years or older b. U.S. Government transaction is older than 3 years or there is no U.S. Government transaction c. No U.S. Carfax activity (Service, Dealer, Inspection, Title) within last consecutive three years

Based on this extensive SSE Analysis, Toyota intends to make an adjustment to 18V024 as follows:

18V024 Population	628,018
- Scrapped/Salvage	19,167
- Export	37,332
- Stolen	120
- "Other"	10,624
Adjusted Population	560,775

Recall Outreach: Out of Transit Business Rules

1.1 Document Information

Document Name	Out of Transit Business Rules
Document Owner	SME
Applies To	Identification & exclusion of Off the road VINs for Recall outreach
Effective Date	March 01, 2018
Approved By	
Contact person for questions or policy Interpretation	Ann Allstrom – Product Management (IHS Markit) Roberta Brindley – IT Production Support (IHS Markit)
Revision Cycle	annually
Data Policy was last reviewed	

1.2 Distribution

SSA
IHS Markit
NHTSA
Toyota
Mazda
Subaru
BMW
Nissan

Revision History

Date	Version	Description	Author
Feb 20 2018	1.0	Initial release	Supraja Morasa
Jan 14 2019	1.1	Updated section 2.2 Summary of Business Objectives	Daryl Ramey

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Recall Outreach: Out of Transit Business Rules

2. Introduction

2.1 Document Purpose

The document outlines the definitions and business rules around identification of Out of Transit VINs for Recall purposes by IHS Markit. The Out of Transit business rules should be agreed upon among **IHS Markit, SSA, NHTSA and OEMs**.

2.2 Summary of Business Objectives

This document defines business rules of the Out of Transit categories that identify candidate records for the SSE process. VINs potentially identified as off the road are based on the recent/latest record of the VIN data received by IHS Markit. All SSE Types that a VIN qualifies for are identified. Out of Transit data shall be re-evaluated monthly.

#	SSE Type	Rules
1	Export	<ol style="list-style-type: none"> 1. Compare VINs to Export, Carfax Recent Activity, and Government (U.S. and Canada) recent activities to identify VIN as 'Export' and considered as Out of Transit in U.S. 2. If the Export date is considered more recent than the U.S. Government transaction date and there is no U.S. Carfax activity (Service, Dealer, Inspection, Title) that is considered more recent than the Export date, the VIN will be flagged as Out of Transit with a category of 'Export'. 3. If the country associated with the Export is Canada and the activity date is considered more recent than the U.S. Government transaction date, the VIN will be flagged as Out of Transit with a category of 'Export'. 4. If the Canadian registration date is considered more recent than the U.S. Government transaction date and there is no Carfax activity (Service, Dealer, Inspection, Title) within the U.S. that is considered more recent than the Canadian registration date, the VIN will be flagged as Out of Transit with a category of 'Export'.
2	Scrapped	<ol style="list-style-type: none"> 1. Compare VINs to U.S. Government Branded Title recent activities to identify VIN as 'Scrapped' and considered as Out of Transit in U.S. 2. If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Scrapped': <ol style="list-style-type: none"> a. VIN is identified as Junk, Dismantled or Salvage. b. Current owner is classified as an insurance or salvage organization. 3. If a VIN is Rebuilt or Reconstructed the Out of Transit flag will be removed or not applied as appropriate. Rebuilt and Reconstructed titles take precedence when any of the Branded titles listed above for a VIN are received on the same day as the Rebuilt or Reconstructed title.
3	Stolen	<ol style="list-style-type: none"> 1. Compare VINs to U.S. Government Branded Title recent activities to identify VIN as 'Stolen' and considered as Out of Transit in U.S. 2. If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Stolen': <ol style="list-style-type: none"> a. VIN is identified as Stolen for the current owner. 3. If a VIN is Recovered Stolen the Out of Transit flag will be removed or not applied as appropriate. Recovered Stolen titles take precedence when the Stolen title for a VIN is received on the same day as the Recovered Stolen title.
4	Salvage	<ol style="list-style-type: none"> 1. Compare VINs to U.S. Government Branded Title recent activities to identify VIN as 'Salvage' and considered as Out of Transit in U.S. 2. If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Salvage': <ol style="list-style-type: none"> a. VIN is identified as Junk, Dismantled, or Salvage for the current owner. b. VIN is not flagged as Out of Transit with a category of 'Scrapped'. 3. If a VIN is Rebuilt or Reconstructed the Out of Transit flag will be removed or not applied as appropriate. Rebuilt and Reconstructed titles take precedence when any of the Branded titles listed above for a VIN are received on the same day as the Rebuilt or Reconstructed title.
5	Other Out of Transit	<ol style="list-style-type: none"> 1. No recent activity of the VIN (excludes VINs of non-expiring State, Plate and Government owner classification). If the following conditions are true, VIN is flagged as Out of Transit with a category of 'Other Out of Transit': <ol style="list-style-type: none"> a. VIN is 5 years or older b. U.S. Government transaction is older than 3 years or there is no U.S. Government transaction c. No U.S. Carfax activity (Service, Dealer, Inspection, Title) within last consecutive three years
VINs not falling under above categories are considered 'In-Transit' or 'On The Road'		

Out of Transit category priority:

Priority	Out of Transit Category
1	Export
2	Scrapped
3	Stolen
4	Salvage
5	Other Out of Transit (No Recent Activity)

2.3 Open Questions/Items

#	Open Items	Confirmation from	Resolution	Status
1	Are we only using Carfax as an activity indicator or are there any other sources?	Ann Allstrom	Currently Carfax is the only source to identify recent activity of a VIN	Closed
2	Priorities of Off the Road indicators	Ann Allstrom	Identified the priority in 2.2 above	Closed