



**Toyota Motor North America**

Vehicle Safety & Compliance  
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June 24, 2020

James Owens  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Petition for Exemption from Notification and Remedy Requirements  
Inconsequential Noncompliance with FMVSS 209 - Certain 2019MY Toyota Vehicles  
[Docket No. NHTSA-2019-0098]**

Dear Mr. Owens:

Toyota is submitting this comment to supplement the information provided in its September 27, 2019 Petition for Exemption from Notification and Remedy Requirements, Pursuant to 49 CFR Part 556, concerning 70 Tacoma vehicles. As noted in the petition, Toyota submitted a Noncompliance Information Report concerning these 2019 model year Toyota Tacoma vehicles that may not meet certain label or marking requirements of FMVSS No. 209—specifically Paragraph S4.1(j) of FMVSS No. 209, which states that “Each seatbelt assembly shall be permanently and legibly marked or labeled with year of manufacture, model, and name or trademark of manufacturer or distributor, or of importer if manufactured outside the United States.” The primary purpose of the seatbelt label required by FMVSS No. 209, Paragraph S4.1(j) is to identify the seatbelt in the event it needs to be replaced.

In support of its petition, Toyota explained that there were a number of factors that make improper replacement seatbelt assembly selection and installation unlikely to occur. For example, in cases where a seatbelt replacement is needed, the service parts system would preclude the purchase and installation of an improper replacement seatbelt assembly because seatbelt assembly service parts are ordered through the Toyota authorized dealership system using the seatbelt assembly part number or the VIN. The replacement parts for the subject seatbelt assemblies are not distributed through the general automotive aftermarket; they are only sold by Toyota dealers.

In addition, Toyota explained that, when a purchaser orders a seatbelt replacement part, the installation, usage, and maintenance instructions are included in the service parts packaging and clearly identifies that the seatbelt is for a Toyota Tacoma and identifies the seatbelt installation location, in compliance with paragraph S4.1(k) of FMVSS No. 209.

However, Toyota filed a separate Equipment Noncompliance Information Report on May 4, 2020 indicating that certain replacement seatbelt assemblies may not have been packaged with an installation instruction sheet or may have been packaged with an incorrect instruction sheet intended for a different seatbelt assembly. While some of the replacement assemblies covered by the May 4, 2020 Equipment Noncompliance Information Report are designed to be installed on the same model/MY Tacoma vehicles as the 70 Tacoma vehicles that are the subject of this Petition, Toyota checked the service history and CARFAX reports on all 70 of these Tacoma vehicles and none of them have replaced the rear center seatbelt according to that information. As the replacement seatbelt assemblies in Toyota part distribution centers that are affected by the issue described in the May 4, 2020 Equipment Noncompliance Information Report have been held and prevented from distribution, it is highly unlikely that any of the aforementioned 70 Tacoma vehicles could be repaired using a replacement assembly affected by this missing or incorrect instruction sheet issue.

Sincerely,

A handwritten signature in black ink that reads "Cory Hoffman". The signature is written in a cursive, flowing style.

Cory Hoffman  
General Manager  
Toyota Motor North America, Inc.