#### **Toyota Motor North America**

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

May 28, 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 Tokai Rika Mexico Replacement Seatbelt Assemblies

Dear Mr. Owens:

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, on behalf of Toyota Motor Corporation ["TMC"], a Japanese corporation located at 1, Toyota-cho, Toyota-city, Aichi-ken, 471-8571, Japan and the Toyota manufacturing entities identified in the attached Noncompliance Information Report dated May 4, 2020 submitted in accordance with the requirements of 49 CFR Part 573 [collectively referred to as "Toyota"], I hereby submit the attached petition to the National Highway Traffic Safety Administration seeking an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that a noncompliance with certain replacement seatbelt assemblies intended for use in certain 2020MY Toyota Corolla vehicles as identified in Toyota's Equipment Noncompliance Information Report is inconsequential as it relates to motor vehicle safety.

As discussed with Mr. Matheke on May 20, 2020, Toyota understands that, due to the ongoing COVID-19 situation, NHTSA staff will not be present in the office to receive the attached materials that are normally submitted through mail. Thus, Toyota is electronically submitting this petition in accordance with NHTSA's request. Included in the email submission is (1) a copy this cover letter; (2) a copy of the petition; and (3) a copy of the Equipment Noncompliance Information Report relating to the petition. Per the discussion with Mr. Matheke, these materials will be emailed to his email address. It is understood that submission through this method will be considered in conformance with 49 CFR Part 556.4(b)(2) and (6) and will not prejudice the agency's evaluation of the substance of the petition. Toyota is willing to send this duplicate copy of this submission via mail according to the normal process in the future upon NHTSA's request.

Please contact me should you have any questions about this petition.

Sincerely. DHAL Corv Hoffman

General Manager Toyota Motor North America, Inc.

Cc: Jeffrey Giuseppe, Otto Matheke

Enclosures

Petition for Inconsequential Noncompliance Attachment 1 (Noncompliance Information Report)

### Petition for Exemption from Notification and Remedy Requirements Pursuant to 49 CFR Part 556

#### Inconsequential Noncompliance with FMVSS No. 209 In Certain Replacement Seatbelt Assemblies

### **Executive Summary**

Toyota submitted the attached Equipment Noncompliance Information Report concerning certain replacement seatbelt assemblies that may not meet the requirements of FMVSS No. 209, paragraph S4.1(k) and (l) due to a missing instruction sheet (see Attachment 1) with the required installation, use, and maintenance information.

As further described below, Toyota believes that the noncompliance in this case is inconsequential as it relates to motor vehicle safety for a number of reasons. First, it is unlikely that these replacement assemblies would be selected for an incorrect seating position as a result of this issue. The seatbelt assemblies were only sold by authorized Toyota dealerships, and the service parts ordering process would not likely provide a different assembly from that which was ordered. In addition, the purchaser can identify that the seatbelt assembly is the correct replacement by the part number/description on the box and the new part can be compared to the old part.

Second, it is unlikely that these replacement assemblies would be installed incorrectly, because the installation instructions are readily available from various other sources and the installation procedure is generally the reverse of the part removal procedure.

Third, it is unlikely that vehicle owners would improperly use or maintain these seatbelt assemblies as a result of this issue, because these assemblies are replacements for the original equipment, and the proper usage and maintenance instructions are in the vehicle owner's manual.

Fourth, Toyota has determined that, with the exception of the installation instruction sheets, the subject seatbelt assemblies comply with FMVSS No. 209 and Toyota conducted a search of its field data as described, below, and found no allegations of missing instruction sheets.

Finally, in similar situations, NHTSA has granted inconsequentiality petitions in the past.

Below, Toyota provides the data, its views, and its arguments in support of this petition. For the reasons set forth below, Toyota believes this noncompliance is inconsequential as it relates to motor vehicle safety.

### Summary of Noncompliance

This noncompliance involves 37 seatbelt assemblies sold as replacement equipment referenced in the attached Noncompliance Information Report. FMVSS No. 209, paragraph S4.1(k) requires that each seatbelt assembly, other than a seatbelt assembly installed in a motor vehicle by an automobile manufacturer, be accompanied by an installation instruction sheet. Paragraph S4.1(l) requires a seatbelt or retractor assembly to include proper usage and maintenance instructions. Due to an improper packaging process at a specific supplier, certain replacement seatbelt assemblies may not have been packaged with an instruction sheet meeting these requirements.

# Reasons this Noncompliance is Inconsequential as it relates to Motor Vehicle Safety

### I. <u>The subject seatbelt assemblies were sold only by Toyota dealerships</u>. <u>Due to the</u> <u>dealerships' replacement parts ordering system and the parts packaging, improper</u> <u>replacement seatbelt assembly selection would not likely occur.</u>

It is unlikely that the subject replacement seatbelt assemblies would be selected for an incorrect seating position as a result of this issue. The subject assemblies were only sold by Toyota dealerships. The parts ordering system clearly indicates the part and enables identification of the appropriate model vehicle and seating position for which the assembly is intended to be installed. When selecting a replacement part, the dealerships can search by VIN, part number, and vehicle model. They can also see a diagram of the part location via the Electronic Parts Catalog. In addition, the part can be identified by the label on the box and the old part can be compared to the new part. The label on the box in which the replacement seatbelt is packaged specifies the part number and part description (see Figure 1).



Figure 1, Label on Part Box

Because of the Toyota dealerships' robust part ordering system and the additional label on the box, it is unlikely that an incorrect seatbelt would be provided or used as a replacement part. The missing instruction sheet has no effect on a dealership's ability to provide the correct replacement part ordered or on the installer's ability to correctly identify the appropriate replacement part.

# II. <u>The improper installation of the seatbelt assembly is unlikely. Dealership</u> <u>technicians and third-party installers can access Toyota's electronic repair manual</u> <u>and other aftermarket manuals.</u>

It is unlikely that an improper installation of a replacement seatbelt would occur as a result of a missing instruction sheet. First, if the instruction sheet is missing from the box, the installer would likely obtain the correct installation information from a different source or would return the part to the dealer.

Second, after identifying that the part does not have the installation instruction sheet, the installer could return the part to the dealer, request the installation instructions from the dealer, or consult other sources of installation instructions that are readily available. Technicians at Toyota dealerships have access to Toyota's electronic repair manual. Third party installers have access to various aftermarket repair manuals and can obtain access to Toyota's electronic repair manual. Finally, the installer can also request a copy of the installation instructions from Toyota, and it would be provided free of charge.

Third, the subject assemblies themselves have characteristics that discourage incorrect installation. Because the subject seatbelts are not universal type seatbelts, they are intended to be used to replace specific seatbelts in specific seating positions. Thus, the installation procedure is the reverse of part removal. Further, Toyota believes that it is unlikely that the subject seatbelts can be installed properly in an incorrect seating position. All of the subject assemblies are intended to be used as replacement equipment for the 2020MY Corolla rear seat. Toyota determined that these seatbelt assemblies cannot be properly installed in any of the other 2020MY Corolla seating positions and are not used on any other Toyota or Lexus models.

For these reasons it is unlikely that the subject seatbelt assemblies would be improperly installed.

# III. <u>The replacement seatbelt assemblies are intended to replace the original equipment</u> seatbelts. The owner's manual for each vehicle contains the seatbelt usage and <u>maintenance instructions.</u>

It is unlikely that an improper use or maintenance of a replacement seatbelt would occur as a result of a missing instruction sheet. The affected seatbelt assemblies are intended to replace the originally equipped seatbelts in specific Toyota Corolla vehicles. All of the Corolla vehicles for which these replacement seatbelt assemblies were designed were originally equipped with an owner's manual that contains usage and maintenance instructions for these seatbelt assemblies. Thus, the vehicle owner has access to the usage and maintenance instructions and would not need to refer to the instruction sheet for this information.

# IV. The seatbelts comply with all other requirements of FMVSS No. 209.

The lack of the instruction sheets has no bearing on the materials or performance of the replacement seatbelt assembly itself. Thus, the assemblies continue to meet the other performance requirements specified in FMVSS No. 209. There is no impact to performance, functionality, or occupant safety.

# V. Toyota is unaware of allegations of missing instruction sheets.

Toyota has searched its records for allegations of missing instruction sheets concerning the subject replacement seatbelt assemblies. As of 4/23/2020 no owner complaints, field reports, warranty claims, legal claims, or dealer technical assistance calls, concerning the missing installation instruction sheets were found.

# VI. <u>In similar situations, NHTSA has granted petitions for inconsequential</u> noncompliance relating to the subject requirement of FMVSS No. 209.

NHTSA has previously granted at least seven similar petitions for inconsequential noncompliance for missing or incorrect instruction sheets for certain replacement seatbelt assemblies. These include: FCA US LLC (84 *Fed. Reg.* 20948, May 3, 2019); Mitsubishi Motors North America, Inc., (77 *Fed. Reg.* 24762, April 25, 2012); Bentley Motors Inc. (76 *Fed. Reg.* 58343, September 20, 2011); Hyundai Motor Company (74 *Fed. Reg.* 9125, March 2, 2009); Ford Motor Company, (73 *Fed. Reg.* 11462, March 3, 2008); Mazda North American Operations (73 *Fed. Reg.* 11464, March 3, 2008); and Subaru of America, Inc., (65 *Fed. Reg.* 67471, November 9, 2000).

In these cases, NHTSA determined that the noncompliance was inconsequential to motor vehicle safety for reasons that included the following: (1) the dealer ordering system would make it unlikely that an inappropriate seatbelt assembly would be sold for a specific seating position; (2) installers would be able to locate installation instructions from other sources; (3) the usage and maintenance instructions are available in the vehicles owner's manual; and (4) the seatbelts are intended to be replacement parts for original equipment designed for specific seating positions. These reasons also apply to the subject Toyota replacement seatbelt assemblies.

# **Conclusion**

For the reasons set forth above, Toyota believes this noncompliance is inconsequential as it relates to motor vehicle safety and seeks an exemption from the notice and remedy requirements of 49 U.S.C. Chapter 301 for the subject vehicles.

# ΤΟΥΟΤΑ

Toyota Motor North America, Inc.

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

May 4, 2020

# NONCOMPLIANCE INFORMATION REPORT (Equipment)

#### 1. <u>Equipment Distribution Company:</u>

Toyota Motor North America, Inc. ["TMNA"] 6565 Headquarters Drive, Plano, TX 75024

Manufacturer of the Seatbelt Assemblies

Tokai Rika Mexico ["TRMX"] Boulevard Interpuerto Monterrey #103 Fraccionamiento Industrial Interpuerto Monterrey, Salinas Victoria, NL, CP 65500 Mexico Phone: +52 (81) 2314-3300

Country of Origin: Mexico

#### 2. <u>Identification of Affected Equipment:</u>

The items of equipment involved are replacement seatbelt assemblies intended for use as replacement parts for the 2020MY Toyota Corolla.

Component Name	Part Number	Dates of Manufacture
BELT ASSY, RR SEAT, INNER RH	73380-02070	March 1, 2019
BELT ASSY, RR SEAT, INNER W/CTR, LH	73480-02530	April 15, 2020

Note: (1) This issue only involves certain replacement seatbelt assemblies produced at TRMX.
(2) Although the involved equipment are within the above production range, not all equipment produced in this range have the noncompliance described below because the production ranges are estimates based on the available information from the seatbelt assembly manufacturer.

#### 3. <u>Total Number of Equipment Potentially Involved:</u>

Total : 37

#### 4. <u>Percentage of Equipment Estimated to Actually Experience Noncompliance:</u>

100%

#### 5. <u>Description of Noncompliance</u>:

In FMVSS No. 209, paragraph S4.1(k) requires that each seatbelt assembly, other than a seatbelt assembly installed in a motor vehicle by an automobile manufacturer, be accompanied by an installation instruction sheet. Paragraph S4.1(l) requires a seatbelt or retractor assembly to include proper usage and maintenance instructions. Due to an improper packaging process at a specific supplier, certain replacement seatbelt assemblies may not have been packaged with an instruction sheet meeting these requirements. As a result, the subject equipment may not meet the requirements of FMVSS No. 209, paragraphs S4.1 (k) and (l).

#### 6. <u>Test Results and Other Information</u>:

During an audit at the Toyota parts distribution centers, Toyota found that certain inner seatbelt assemblies, that were produced by this supplier, were missing the instruction sheets. Toyota investigated the issue by reviewing the supplier's processes and conducting further audits of parts produced by this supplier. On April 28, 2020, based on these investigations, Toyota determined that the supplier did not have the appropriate process and inspection controls in place for certain inner seatbelt assemblies and that some affected assemblies may have been sold without the instruction sheet resulting in those assemblies potentially not meeting the requirements of FMVSS No. 209, paragraph S4.1 (k) and (l).

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

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

#### **Toyota Motor North America**

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

May 28, 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 Joyson Safety System Replacement Seatbelt Assemblies

Dear Mr. Owens:

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, on behalf of Toyota Motor Corporation ["TMC"], a Japanese corporation located at 1, Toyota-cho, Toyota-city, Aichi-ken, 471-8571, Japan and the Toyota manufacturing entities identified in the attached Noncompliance Information Report dated May 4, 2020 submitted in accordance with the requirements of 49 CFR Part 573 [collectively referred to as "Toyota"], I hereby submit the attached petition to the National Highway Traffic Safety Administration seeking an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that a noncompliance with certain replacement seatbelt assemblies intended for use in certain 1995-2020MY Toyota vehicles as identified in Toyota's Equipment Noncompliance Information Report is inconsequential as it relates to motor vehicle safety.

As discussed with Mr. Matheke on May 20, 2020, Toyota understands that, due to the ongoing COVID-19 situation, NHTSA staff will not be present in the office to receive the attached materials that are normally submitted through mail. Thus, Toyota is electronically submitting this petition in accordance with NHTSA's request. Included in the email submission is (1) a copy this cover letter; (2) a copy of the petition; and (3) a copy of the Equipment Noncompliance Information Report relating to the petition. Per the discussion with Mr. Matheke, these materials will be emailed to his email address. It is understood that submission through this method will be considered in conformance with 49 CFR Part 556.4(b)(2) and (6) and will not prejudice the agency's evaluation of the substance of the petition. Toyota is willing to send this duplicate copy of this submission via mail according to the normal process in the future upon NHTSA's request.

Please contact me should you have any questions about this petition.

Sincerely, Cory Hoffma

General Manager Toyota Motor North America, Inc.

Cc: Jeffrey Giuseppe, Otto Matheke

Enclosures Petition for Inconsequential Noncompliance Attachment 1 (Noncompliance Information Report)

### Petition for Exemption from Notification and Remedy Requirements Pursuant to 49 CFR Part 556

#### Inconsequential Noncompliance with FMVSS No. 209 In Certain Replacement Seatbelt Assemblies

### **Executive Summary**

Toyota submitted the attached Equipment Noncompliance Information Report concerning certain replacement seatbelt assemblies that may not meet the requirements of FMVSS No. 209, paragraph S4.1(k) and (l) due to a missing or incorrect instruction sheet (see Attachment 1) with the required installation, use, and maintenance information.

As further described below, Toyota believes that the noncompliance in this case is inconsequential as it relates to motor vehicle safety for a number of reasons. First, it is unlikely these replacement assemblies would be selected for an incorrect seating position as a result of this issue. The seatbelt assemblies were only sold by authorized Toyota dealerships, and the service parts ordering process would not likely provide a different assembly from that which was ordered. In addition, the purchaser can identify that the seatbelt assembly is the correct replacement by the part number/description on the box and the new part can be compared to the old part.

Second, it is unlikely that these replacement assemblies would be installed incorrectly, because other sources of the correct installation instructions are readily available from various sources, the installation procedure is generally the reverse of the part removal procedure, and the bolt torque specifications for structurally mounting the assemblies are the same for all of the affected seatbelt assemblies.

Third, it is unlikely that vehicle owners would improperly use or maintain these seatbelt assemblies, as a result of this issue, because these assemblies are replacements for the original equipment, and the proper usage and maintenance instructions are in the vehicle owner's manual.

Fourth, Toyota has determined that, with the exception of the installation instruction sheets, the subject seatbelt assemblies comply with FMVSS No. 209 and Toyota conducted a search of its field data as described, below, and found no allegations of missing or incorrect instruction sheets.

Finally, in similar situations, NHTSA has granted inconsequentiality petitions in the past.

Below, Toyota provides the data, its views, and its arguments in support of this petition. For the reasons set forth below, Toyota believes this noncompliance is inconsequential as it relates to motor vehicle safety.

### Summary of Noncompliance

This noncompliance involves the approximately 97,550 seatbelt assemblies sold as replacement equipment referenced in the attached Noncompliance Information Report. FMVSS No. 209, paragraph S4.1(k) requires that each seatbelt assembly, other than a seatbelt assembly installed in a motor vehicle by an automobile manufacturer, be accompanied by an installation instruction sheet. Paragraph S4.1(l) requires a seatbelt or retractor assembly to include proper usage and maintenance instructions. Due to an improper packaging process at a specific supplier, certain replacement seatbelt assemblies may not have been packaged with an instruction sheet meeting these requirements, because the instruction sheet was missing or was an incorrect instruction sheet intended for a different seatbelt assembly.

# Reasons this Noncompliance is Inconsequential as it relates to Motor Vehicle Safety

# I. <u>The subject seatbelt assemblies were sold only by Toyota dealerships. Due to the</u> <u>dealerships' replacement parts ordering system and the parts packaging, improper</u> <u>replacement seatbelt assembly selection would not likely occur.</u>

It is unlikely that the subject replacement seatbelt assemblies would be selected for an incorrect seating position as a result of this issue. The subject assemblies were only sold by Toyota dealerships. The parts ordering system clearly indicates the part and enables identification of the appropriate model vehicle and seating position for which the assembly is intended to be installed. When selecting a replacement part, the dealerships can search by VIN, part number, and vehicle model. They can also see a diagram of the part location via the Electronic Parts Catalog. In addition, the part can be identified by the label on the box and the old part can be compared to the new part. The label on the box in which the replacement seatbelt is packaged specifies the part number and part description (see Figure 1).



Figure 1, Label on Part Box

Because of the Toyota dealerships' robust part ordering system and the additional label on the box, it is unlikely that an incorrect seatbelt would be provided or used as a replacement part. The missing or incorrect instruction sheet has no effect on a dealership's ability to provide the correct replacement part ordered or on the installer's ability to correctly identify the appropriate replacement part.

# II. Improper installation of the seatbelt assembly is unlikely. Dealership technicians and third-party installers can access Toyota's electronic repair manual and other aftermarket manuals.

It is unlikely that an improper installation of a replacement seatbelt would occur as a result of a missing or incorrect instruction sheet. First, an instruction sheet specifies the vehicle model and includes an image of the seating position(s). Thus, if an incorrect instruction sheet is packaged with the seatbelt assembly, the purchaser would likely notice that the instruction is not for the part that was purchased and either confirm that the seatbelt is correct based on the part number listed on the box and obtain the correct installation information from a different source or would return the part to the dealer.

Second, after identifying that the part does not have the proper installation instruction sheet, the installer could return the part to the dealer, request the correct installation instruction from the dealer, or consult other sources of installation instructions that are readily available. Technicians at Toyota dealerships have access to Toyota's electronic repair manual. Third party installers have access to various aftermarket repair manuals and can obtain access to Toyota's electronic repair manual. Finally, the installer can also request a copy of the installation instructions from Toyota, and the instructions would be provided free of charge.

Third, the subject assemblies themselves have characteristics that discourage incorrect installation. Because the subject seatbelts are not universal type seatbelts, they are intended to be used to replace specific seatbelts in specific seating positions. Thus, the installation procedure is the reverse of part removal. Further, Toyota believes that it is unlikely that the subject seatbelts can be installed properly in an incorrect seating position. Based on the audits Toyota conducted of the replacement seatbelt assemblies in its parts distribution centers, Toyota identified 27 different replacement seatbelt assembly models that had incorrect instruction sheets. While there could be other variations not identified in these audits, Toyota determined that the seatbelt assemblies identified in these audits, Toyota determined that the seatbelt assemblies is a standard value and is correct regardless of which instruction sheet is used (42Nm). Because these torque values are common, even if the technician uses the torque values from the wrong installation instruction sheet, the torque value will still be correct.

For these reasons it is unlikely that the subject seatbelt assemblies would be improperly installed.

# III. <u>The replacement seatbelt assemblies are intended to replace the original equipment</u> <u>seatbelts. The owner's manual for each vehicle contains the seatbelt usage and</u> <u>maintenance instructions.</u>

It is unlikely that an improper use or maintenance of a replacement seatbelt would occur as a result of a missing or incorrect instruction sheet. The affected seatbelt assemblies are designed to replace the originally equipped seatbelts in specific Toyota vehicles. All of the vehicle models for which these replacement seat assemblies were designed were originally equipped with an owner's manual that contains usage and maintenance instructions for these seatbelt assemblies. Thus, the vehicle owner has access to the usage and maintenance instructions and would not need to refer to the instruction sheet for this information.

# IV. The seatbelts comply with all other requirements of FMVSS No. 209.

The missing or incorrect instruction sheets have no bearing on the materials or performance of the replacement seatbelt assembly itself. Thus, the assemblies continue to meet the other performance requirements specified in FMVSS No. 209. There is no impact to performance, functionality, or occupant safety.

# V. Toyota is unaware of allegations of missing or incorrect instruction sheets.

Toyota has searched its records for allegations of missing or incorrect instruction sheets concerning the subject replacement seatbelt assemblies. As of 4/23/2020 no owner complaints, field reports, warranty claims, legal claims, or dealer technical assistance calls, concerning the missing or incorrect installation instruction sheets were found.

# VI. <u>In similar situations, NHTSA has granted petitions for inconsequential</u> noncompliance relating to the subject requirement of FMVSS No. 209.

NHTSA has previously granted at least seven similar petitions for inconsequential noncompliance for missing or incorrect instruction sheets for certain replacement seatbelt assemblies. These include: FCA US LLC (84 *Fed. Reg.* 20948, May 3, 2019); Mitsubishi Motors North America, Inc., (77 *Fed. Reg.* 24762, April 25, 2012); Bentley Motors Inc. (76 *Fed. Reg.* 58343, September 20, 2011); Hyundai Motor Company (74 *Fed. Reg.* 9125, March 2, 2009); Ford Motor Company, (73 *Fed. Reg.* 11462, March 3, 2008); Mazda North American Operations (73 *Fed. Reg.* 11464, March 3, 2008); and Subaru of America, Inc., (65 *Fed. Reg.* 67471, November 9, 2000).

In these cases, NHTSA determined that the noncompliance was inconsequential to motor vehicle safety for reasons that included the following: (1) the dealer ordering system would make it

unlikely that an inappropriate seatbelt assembly would be sold for a specific seating position; (2) installers would be able to locate installation instructions from other sources; (3) the usage and maintenance instructions are available in the vehicles owner's manual; and (4) the seatbelts are intended to be replacement parts for original equipment designed for specific seating positions. These reasons also apply to the subject Toyota replacement seatbelt assemblies.

#### **Conclusion**

For the reasons set forth above, Toyota believes this noncompliance is inconsequential as it relates to motor vehicle safety and seeks an exemption from the notice and remedy requirements of 49 U.S.C. Chapter 301 for the subject vehicles.

# ΤΟΥΟΤΑ

#### Toyota Motor North America, Inc.

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

May 4, 2020

# NONCOMPLIANCE INFORMATION REPORT (Equipment)

#### 1. Equipment Distribution Company:

Toyota Motor North America, Inc. ["TMNA"] 6565 Headquarters Drive, Plano, TX 75024

Manufacturer of the Seatbelt Assemblies

Joyson Safety Systems, Santa Rosa Plant ["JSS"] Carretera a Santa Rosa Km 3.5, C.P. 66600 Apodaca, N.L. México Phone: +52 818 156 1100 Ext. 358735

Country of Origin: Mexico

#### 2. <u>Identification of Affected Equipment:</u>

The items of equipment involved are replacement seatbelt assemblies intended for use as replacement parts for one or more of the following Toyota vehicles: 2000-2019MY Avalon/Avalon HV, 2018-2020MY Camry/Camry HV, 2000-2020MY Corolla, 2003-2013MY Matrix, 2001-2008MY Sequoia, 2001-2020MY Sienna, 1995-2016MY Tacoma, 2004-2008MY Tundra, and 2009-2016MY Venza.

Part Name	Part Number	Dates of Manufacture
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-06211	08/10/2018 through 02/25/2020
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-06221	08/10/2018 through 02/25/2020
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-06271	08/10/2018 through 02/25/2020
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-06281	08/10/2018 through 02/25/2020
BELT ASSY, RR SEAT, OUTER CTR	73350-06080	06/22/2017 through 02/25/2020
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-06220	06/22/2017 through 02/25/2020
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-06210	06/22/2017 through 02/25/2020
BELT ASSY, RR SEAT, OUTER LH	73370-06120	06/22/2017 through 02/25/2020
BELT ASSY, RR SEAT, OUTER LH	73370-06122	06/22/2017 through 02/25/2020

BELT ASSY, RR SEAT, INNER	73380-04080	08/06/2015 through 02/25/2020
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-04030	08/06/2015 through 02/25/2020
BELT ASSY, RR SEAT, INNER RH	73380-04090	07/01/2015 through 02/25/2020
BELT ASSY, RR SEAT, OUTER CTR	73350-04030	07/01/2015 through 02/25/2020
BELT ASSY, RR SEAT, OUTER RH	73360-04090	07/01/2015 through 02/25/2020
BELT ASSY, RR SEAT, OUTER RH	73360-04100	07/01/2015 through 02/25/2020
BELT ASSY, RR SEAT, OUTER LH	73370-04080	07/01/2015 through 02/25/2020
BELT ASSY, RR SEAT, OUTER LH	73370-04070	08/21/2014 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, OUTER RH	73360-08051	04/08/2014 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, OUTER LH	73370-08041	04/08/2014 through 02/25/2020
BELT SUB-ASSY, SEAT, OUTER A	73301-08010	11/01/2010 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, OUTER RH	73360-08050	11/01/2010 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, OUTER RH	73360-08060	11/01/2010 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, OUTER LH	73370-08040	11/01/2010 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, INNER RH	73380-08020	11/01/2010 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, INNER RH	73380-08030	11/01/2010 through 02/25/2020
BELT ASSY, RR NO.1 SEAT, INNER LH	73390-08020	11/01/2010 through 02/25/2020
BELT SUB-ASSY, SEAT, INNER A	73306-08010	01/05/2010 through 02/25/2020
BELT ASSY, RR SEAT, OUTER RH	73360-06381	05/24/2018 through 02/01/2019
BELT ASSY, RR SEAT, OUTER LH	73370-06121	05/24/2018 through 02/01/2019
BELT ASSY, RR SEAT, OUTER	73360-02560	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT, OUTER	73360-02590	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-02380	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-02420	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-02550	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-02381	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-02551	08/01/2013 through 02/01/2019
BELT ASSY, RR SEAT, OUTER RH	73360-06380	12/05/2016 through 08/30/2018
BELT ASSY, RR SEAT, OUTER RH	73360-06382	12/05/2016 through 08/30/2018
BELT ASSY, RR SEAT, OUTER	73360-07041	11/05/2013 through 04/06/2018
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-07032	01/07/2016 through 04/05/2018
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-07052	07/07/2015 through 04/05/2018
BLT ASY, RR SEAT LAP TYP, CTR	73350-01040	11/06/2006 through 03/27/2018
BELT ASSY, RR SEAT LAP TYPE, CTR	73350-01041	11/06/2006 through 03/27/2018
BELT ASSY, RR SEAT, OUTER RH	73360-01100	11/27/2001 through 03/27/2018
BELT ASY, RR SEAT INN W/CTR, LH	73480-01030	11/27/2001 through 03/27/2018
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-07051	11/05/2013 through 02/01/2018
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-07031	11/05/2013 through 02/01/2018
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-06200	09/18/2015 through 08/25/2017
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-06240	09/18/2015 through 08/25/2017
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-06270	09/18/2015 through 08/25/2017
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-06280	09/18/2015 through 08/25/2017
BELT ASY, RR SEAT, INNR DK GRY	73380-01040	12/04/2001 through 04/11/2017
BELT ASSY, RR SEAT, OUTER LH	73370-0T020	02/04/2013 through 04/01/2017
BELT ASSY, RR SEAT, OUTER CTR	73350-0T020	05/29/2012 through 04/01/2017
BELT ASSY, RR SEAT, OUTER LH	73370-0T010	05/16/2012 through 04/01/2017

BELT ASSY, RR SEAT, INNER LH	73480-0T010	05/16/2012 through 04/01/2017
BELT ASSY, RR SEAT, OUTER CTR	73350-0T010	05/16/2012 through 04/01/2017
BELT ASSY, RR SEAT, OUTER RH	73360-0T010	05/16/2012 through 04/01/2017
BELT ASSY, RR SEAT, INNER RH	73380-0T010	05/16/2012 through 04/01/2017
BELT ASSY, RR SEAT, INNER	73380-0T020	05/16/2012 through 04/01/2017
BELT ASSY, RR SEAT, INNER	73380-0T040	03/07/2012 through 04/01/2017
BELT ASSY, RR SEAT, OUTER RH	73360-0T020	03/07/2012 through 04/01/2017
BELT ASSY, RR SEAT, OUTER RH	73360-04083	07/28/2008 through 08/06/2015
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-04021	08/04/2004 through 08/06/2015
BELT ASSY, RR SEAT, OUTER LH	73370-04063	07/28/2008 through 08/05/2015
BELT ASSY, RR SEAT, INNER	73380-04070	04/28/2008 through 08/05/2015
BELT ASSY, RR NO.1 SEAT, OUTER LH	73370-08050	04/28/2008 through 08/05/2015
BELT ASSY, RR SEAT, OUTER CTR	73350-04043	10/07/2008 through 07/27/2015
BELT ASSY, RR SEAT, INNER RH	73380-04061	08/25/2004 through 07/27/2015
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-07050	11/01/2012 through 11/08/2013
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-07030	11/01/2012 through 11/08/2013
BELT ASSY, RR SEAT, OUTER	73360-07040	10/01/2012 through 11/08/2013
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-02301	07/08/2008 through 08/01/2013
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-02330	07/08/2008 through 08/01/2013
BELT ASSY, RR SEAT, OUTER	73360-02410	11/28/2007 through 08/01/2013
BELT ASSY, FR SEAT, OUTER RH	73210-AC054	11/28/2011 through 09/21/2012
BELT ASSY, FR SEAT, INNER RH	73230-07021	11/18/2011 through 09/21/2012
BELT ASSY, FR SEAT, INNER LH	73240-AC061	11/18/2011 through 09/21/2012
BELT ASSY, FR SEAT, OUTER LH	73220-AC031	12/10/2009 through 11/28/2011
BELT ASSY, FR SEAT, OUTER LH	73220-AC032	12/10/2009 through 11/28/2011
BELT ASSY, FR SEAT, OUTER LH	73220-AC033	12/10/2009 through 11/28/2011
BELT ASSY, FR SEAT, OUTER LH	73220-AC034	12/10/2009 through 11/28/2011
BELT ASSY, FR SEAT, OUTER RH	73210-AC053	12/10/2009 through 11/28/2011
BELT ASSY, RR SEAT LAP TYPE, CTR	73350-02090	12/10/2007 through 06/24/2010
BELT ASSY, RR SEAT, INNER	73380-02060	12/10/2007 through 06/24/2010
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-02320	12/10/2007 through 06/24/2010
BELT ASSY, RR SEAT, OUTER RH	73360-02400	11/28/2007 through 06/24/2010
BELT ASSY, RR SEAT, OUTER LH	73370-02140	11/28/2007 through 06/24/2010
BELT ASSY, FR SEAT, INNER RH	73230-AC080	11/29/2004 through 03/11/2010
BELT ASSY, FR SEAT, INNER RH	73230-AC091	11/29/2004 through 03/11/2010
BELT ASSY, RR SEAT, OUTER	73360-AC022	07/23/2008 through 03/03/2010
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-AC021	07/23/2008 through 03/02/2010
BELT ASSY, RR SEAT, OUTER CTR	73350-04042	05/06/2008 through 09/23/2008
BELT ASSY, FR SEAT, OUTER RH	73210-AC051	05/17/2006 through 07/29/2008
BELT ASSY, FR SEAT, OUTER RH	73210-AC052	05/17/2006 through 07/29/2008
BELT ASSY, RR SEAT, OUTER	73360-AC021	03/28/2005 through 07/29/2008
BELT ASSY, RR SEAT, OUTER LH	73370-AC020	03/28/2005 through 07/29/2008
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-AC020	03/28/2005 through 07/29/2008
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-AC020	12/10/2004 through 07/29/2008
BELT ASSY, FR SEAT, INNER RH	73230-07020	12/10/2004 through 07/29/2008
BELT ASSY, FR SEAT, INNER RH	73230-AC090	12/10/2004 through 07/29/2008
BELT ASSY, FR SEAT, INNER LH	73240-AC060	12/10/2004 through 07/29/2008

BELT ASSY, RR SEAT INNER W/CTR, RH	73470-AC021	03/28/2005 through 07/28/2008
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-AC022	03/28/2005 through 07/28/2008
BELT ASSY, RR SEAT, OUTER LH	73370-04062	07/02/2007 through 07/25/2008
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-02300	11/28/2007 through 07/08/2008
BELT ASSY, RR SEAT, OUTER LH	73370-04052	07/02/2007 through 05/21/2008
BELT ASSY, RR SEAT, OUTER RH	73360-04072	07/02/2007 through 05/14/2008
BELT ASSY, RR SEAT, OUTER CTR	73350-04041	07/23/2007 through 05/13/2008
BELT ASSY, RR SEAT, INNER	73380-04051	08/04/2004 through 05/09/2008
BELT ASSY, RR SEAT, OUTER RH	73360-04082	07/02/2007 through 05/06/2008
BELT ASSY, RR SEAT, OUTER LH	73370-01100	11/27/2001 through 12/13/2007
BELT ASSY, RR SEAT, OUTER RH	73360-0C040	04/22/2004 through 11/01/2007
BELT ASSY, RR SEAT, OUTER LH	73370-0C040	04/22/2004 through 11/01/2007
BELT ASSY, RR SEAT, OUTER RH	73360-04071	08/04/2004 through 08/02/2007
BELT ASSY, RR SEAT, OUTER LH	73370-04051	08/04/2004 through 08/02/2007
BELT ASSY, RR SEAT, OUTER LH	73370-04061	08/04/2004 through 08/02/2007
BELT ASSY, RR SEAT, OUTER RH	73360-04081	08/04/2004 through 08/01/2007
BELT ASSY, RR SEAT, OUTER	73360-0C060	04/22/2004 through 12/20/2006
BELT SUB-ASSY, SEAT, OUTER A	73301-0C020	07/06/2004 through 12/13/2006
BELT ASSY, RR SEAT, OUTER CTR	73350-04021	08/25/2004 through 10/30/2006
BELT ASSY, FR SEAT, OUTER RH	73210-AC050	07/28/2004 through 05/16/2006
BELT ASSY, FR SEAT, OUTER LH	73220-AC030	07/28/2004 through 05/16/2006
BELT ASSY, FR SEAT, OUTER RH	73210-AC011	11/29/2001 through 05/16/2006
BELT ASSY, RR SEAT, OUTER	73360-01110	04/09/2002 through 09/09/2005
BELT ASSY, RR SEAT, OUTER RH	73360-AC020	12/01/2004 through 03/25/2005
BELT ASSY, RR SEAT INNER W/CTR, RH	73470-AC010	08/18/1999 through 12/10/2004
BELT ASSY, RR SEAT, OUTER	73360-AC010	08/18/1999 through 12/10/2004
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-AC010	08/18/1999 through 12/10/2004
BELT ASSY, FR SEAT, OUTER LH	73220-AC011	08/18/1999 through 12/10/2004
BELT ASSY FR SEAT INNER	73230-AC060	02/11/2003 through 12/07/2004
BELT ASSY FR SEAT INNER LH	73240-AC040	02/11/2003 through 12/07/2004
BELT ASSY FR SEAT INNER	73230-AC070	02/10/2003 through 12/07/2004
BELT ASSY, FR SEAT, OUTER RH	73210-AC030	06/17/2002 through 09/30/2004
BELT ASSY, FR SEAT LAP TYPE, CTR LH	73140-AC020	05/28/2002 through 09/30/2004
BELT ASSY, FR SEAT, OUTER LH	73220-AC020	01/17/2000 through 09/30/2004
BELT ASSY, FR SEAT LAP TYPE, CTR LH	73140-AC010	08/06/1999 through 09/30/2004
BELT ASSY, RR SEAT, OUTER RH	73360-04040	08/08/2000 through 08/23/2004
BELT ASSY, RR SEAT, OUTER LH	73370-04040	08/08/2000 through 08/23/2004
BELT ASSY, RR SEAT, INNER	73380-04030	08/08/2000 through 08/23/2004
BELT ASSY, RR SEAT, INNER	73380-0C020	04/04/2000 through 08/03/2004
BELT ASSY, RR SEAT, OUTER RH	73360-0C020	04/04/2000 through 08/03/2004
BELT SUB-ASSY, SEAT, OUTER A	73360-0C030	04/04/2000 through 08/03/2004
BELT ASSY, RR SEAT, INNER	73380-0C010	04/04/2000 through 08/03/2004
BELT ASSY, RR SEAT, OUTER LH	73370-0C020	04/04/2000 through 08/03/2004
BELT SUB-ASSY, SEAT, INNER A	73306-0C010	04/04/2000 through 08/03/2004
BELT SUB-ASSY, SEAT, OUTER A	73301-0C010	04/04/2000 through 08/03/2004
BELT ASSY, FR SEAT LAP TYPE, CTR RH	73130-AC010	08/06/1999 through 07/13/2004

BELT ASSY, FR SEAT, INNER	73230-AC030	08/06/1999 through 07/13/2004
BELT ASSY, FR SEAT, INNER	73230-AC010	08/06/1999 through 07/13/2004
BELT ASSY, FR SEAT, INNER	73230-AC020	08/06/1999 through 07/13/2004
BELT ASSY, RR SEAT, OUTER LH	73370-01110	04/09/2002 through 02/09/2004
BELT ASY, RR SEAT LAP TPE, CTR	73350-01050	04/29/2002 through 02/03/2004
BELT ASSY RR SEAT LAP TYPE CTR	73350-02060	04/29/2002 through 02/03/2004
BELT ASSY, RR SEAT LAP TYPE, CTR	73350-02061	04/29/2002 through 02/03/2004
BELT ASSY, RR SEAT, OUTER CTR	73350-04040	04/29/2002 through 02/03/2004
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-02041	05/04/2000 through 05/13/2003
BELT ASSY, RR SEAT INNER W/CTR, LH	73480-02061	05/04/2000 through 05/13/2003
BELT ASSY, FR SEAT, INNER RH	73230-AC100	05/28/2002 through 03/14/2003
BELT ASSY, FR SEAT, INNER RH	73230-AC110	05/28/2002 through 03/14/2003
BELT ASSY, FR SEAT, INNER LH	73240-AC010	05/28/2002 through 03/14/2003
BELT ASSY FR INNER LH	73240-AC012	05/28/2002 through 03/14/2003
BELT ASSY, FR SEAT, INNER LH	73240-AC020	05/28/2002 through 03/14/2003
BELT ASSY, FR SEAT, INNER LH	73240-AC030	05/28/2002 through 03/14/2003
BELT ASSY FR SEAT INNER	73230-AC022	05/28/2002 through 02/06/2003
BELT ASSY, FR SEAT, INNER	73230-AC040	05/28/2002 through 01/15/2003
BELT ASSY, FR SEAT, INNER	73230-AC050	05/28/2002 through 12/13/2002
BELT ASSY FR SEAT INNER	73230-AC012	05/28/2002 through 11/19/2002
BELT ASSY, RR SEAT, OUTER RH	73360-02101	07/29/1999 through 11/11/2002
BELT ASSY, RR SEAT, OUTER RH	73360-02100	12/17/1997 through 11/11/2002
BELT ASSY, RR SEAT INNER W/CTR	73480-02060	07/18/1997 through 11/11/2002
BELT ASSY, RR SEAT, OUTER LH	73370-02100	07/29/1999 through 12/08/2001
BELT ASSY, RR SEAT, OUTER LH	73370-02101	07/29/1999 through 12/08/2001
BELT ASSY, RR SEAT INNER W/CTR	73470-02040	05/04/2000 through 12/05/2001
BELT ASSY, FR SEAT, OUTER RH	73210-AC010	08/18/1999 through 11/28/2001
BELT ASSY, FR SEAT, OUTER RH	73210-AC020	08/18/1999 through 11/28/2001
BELT ASSY, FR SEAT, OUTER RH	73210-AC021	08/18/1999 through 11/28/2001
BELT ASSY, FR SEAT, OUTER LH	73220-AC010	08/18/1999 through 11/28/2001
BELT SUB-ASSY, SEAT, OUTER A	73301-0C011	09/16/2019 through 04/02/2020
BELT SUB-ASSY, SEAT, OUTER A	73301-0C031	11/11/2019 through 11/11/2019
BELT SUB-ASSY, SEAT, OUTER A	73301-0C021	10/25/2019 through 04/06/2020
BELT ASSY, FR SEAT, INNER LH	73240-AC070	09/19/2019 through 01/28/2020
BELT ASSY, FR SEAT, INNER RH	73230-07050	09/27/2019 through 02/18/2020

Note: (1) This issue only involves certain replacement seatbelt assemblies produced at JSS.

(2) Although the involved equipment are within the above production range, not all equipment produced in this range have the noncompliance described below, because the production ranges are estimates based, in many instances, on the available information from the seatbelt assembly manufacturer.

3. <u>Total Number of Equipment Potentially Involved</u>:

Approx. : 97, 550

#### 4. <u>Percentage of Equipment Estimated to Actually Experience Noncompliance:</u>

Toyota estimates 72% of the equipment may have actually been sold with incorrect or missing instruction sheets based on the inspection results from a non-representative survey conducted of the parts that were in Toyota's service parts distribution centers during a certain time.

#### 5. <u>Description of Noncompliance</u>:

In FMVSS No. 209, paragraph S4.1(k) requires that each seatbelt assembly, other than a seatbelt assembly installed in a motor vehicle by an automobile manufacturer, be accompanied by an installation instruction sheet. Paragraph S4.1(l) requires a seatbelt or retractor assembly to include proper usage and maintenance instructions. Due to an improper packaging process at a specific supplier, certain replacement seatbelt assemblies may not have been packaged with an instruction sheet meeting these requirements, because the instruction sheet was missing or was an incorrect instruction sheet intended for a different seatbelt assembly. As a result, the subject equipment may not meet the requirements of FMVSS No. 209, paragraphs S4.1 (k) and (l).

#### 6. <u>Test Results and Other Information</u>:

When Toyota checked replacement seatbelt assemblies arriving from the supplier to Toyota's service parts distribution centers as a part of process improvement activities, it was discovered that that the installation instruction sheets may be missing or incorrect. Toyota then conducted inspections of seatbelt assemblies at its distribution centers and further investigated processes and inspection controls at the supplier. On April 28, 2020, based on the results of these investigations, Toyota determined that some affected seatbelt assemblies may have been sold without the instruction sheet or with an incorrect sheet and may not meet the requirements of FMVSS No. 209, paragraph S4.1 (k) and (l).

#### 7. <u>Description of Corrective Repair Action:</u>

Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.

# **20E-028**

Manufacturer Name :Toyota Motor Engineering & ManufacturingSubmission Date :MAY 04, 2020NHTSA Recall No. :20E-028Manufacturer Recall No. :NR



#### **Manufacturer Information :**

Manufacturer Name :Toyota Motor Engineering &<br/>Manufacturing<br/>6565 Headquarters Drive<br/>Plano TX 75024Company phone :1-800-331-4331

#### **Population :**

Number of potentially involved : 37 Estimated percentage with defect : 100 %

#### **Equipment Information :**

Brand / Trade 1:	Tokai Rika Mexico
Model :	Seatbelt Assembly
Part No. :	73380-02070
Size :	NR
Function :	NR
Descriptive Information :	(1) This issue only involves certain replacement seatbelt assemblies produced at TRMX.
	(2) Although the involved equipment are within the above production range, not all equipment produced in this range have the noncompliance described below because the production ranges are estimates based on the available information from the seatbelt assembly manufacturer.
Production Dates :	MAR 01, 2019 - APR 15, 2020
Brand / Trade 2:	Tokai Rika Mexico
Brand / Trade 2 : Model :	Tokai Rika Mexico Seatbelt Assembly
Brand / Trade 2 : Model : Part No. :	Tokai Rika Mexico Seatbelt Assembly 73480-02530
Brand / Trade 2 : Model : Part No. : Size :	Tokai Rika Mexico Seatbelt Assembly 73480-02530 NR
Brand / Trade 2 : Model : Part No. : Size : Function :	Tokai Rika Mexico Seatbelt Assembly 73480-02530 NR NR
Brand / Trade 2 : Model : Part No. : Size : Function : Descriptive Information :	Tokai Rika Mexico Seatbelt Assembly 73480-02530 NR NR (1) This issue only involves certain replacement seatbelt assemblies produced at TRMX. (2) Although the involved equipment are within the above production range, not all equipment produced in this range have the noncompliance described below because the production ranges are estimates based on the available information from the seatbelt assembly manufacturer.
Brand / Trade 2 : Model : Part No. : Size : Function : Descriptive Information : Production Dates :	Tokai Rika Mexico Seatbelt Assembly 73480-02530 NR NR (1) This issue only involves certain replacement seatbelt assemblies produced at TRMX. (2) Although the involved equipment are within the above production range, not all equipment produced in this range have the noncompliance described below because the production ranges are estimates based on the available information from the seatbelt assembly manufacturer. MAR 01, 2019 - APR 15, 2020

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# **Description of Noncompliance :**

Description of th Noncompliance	<ul> <li>In FMVSS No. 209, paragraph S4.1 (k) requires that each seatbelt assembly,</li> <li>other than a seatbelt assembly installed in a motor vehicle by an automobile manufacturer, be accompanied by an installation instruction sheet. Paragraph S4.1 (l) requires a seatbelt or retractor assembly to include proper usage and maintenance instructions. Due to an improper packaging process at a specific supplier, certain replacement seatbelt assemblies may not have been packaged with an instruction sheet meeting these requirements. As a result, the subject equipment may not meet the requirements of FMVSS No. 209, paragraphs S4.1 (k) and (l).</li> </ul>
FMVSS 1	: 209 - Seat belt assemblies
FMVSS 2	: NR
Description of the Safety Risk	: Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.
Description of the Cause	: NR
Identification of Any Warnin that can Occur	g NR :
Involved Components :	
Component Name :	BELT ASSY, RR SEAT, INNER RH
Component Description :	Seatbelt Assembly
Component Part Number :	73380-02070

Component Name :	BELT ASSY, RR SEAT, INNER W/CTR, LH
Component Description :	Seatbelt Assembly
Component Part Number :	73480-02530

# **Supplier Identification :**

# **Component Manufacturer**

Name :Tokai Rika MexicoAddress :Boulevard Interpuerto Monterrey #103Fraccionamiento Industrial InterpuertoFOREIGN STATES CP 65500

Country: Mexico

#### Chronology :

During an audit at the Toyota parts distribution centers, Toyota found that certain inner seatbelt assemblies, that were produced by this supplier, were missing the instruction sheets. Toyota investigated the issue by reviewing the supplier's processes and conducting further audits of parts produced by this supplier. On April 28, 2020, based on these investigations, Toyota determined that the supplier did not have the appropriate process and inspection controls in place for certain inner seatbelt assemblies and that some affected assemblies may have been sold without the instruction sheet resulting in those assemblies potentially not meeting the requirements of FMVSS No. 209, paragraph S4.1 (k) and (l).

#### **Description of Remedy :**

Description of Remedy Program :	Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.
How Remedy Component Differs from Recalled Component :	Not Applicable
Identify How/When Recall Condition was Corrected in Production :	NR

#### **Recall Schedule :**

Description of Recall Schedule :	Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

#### **Purchaser Information :**

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : NR Address : NR NR Country : NR Company Phone : NR

\* NR - Not Reported

The information contained in this report was submitted pursuant to 49 CFR §573

**20E-028** 

# **20E-029**

Manufacturer Name :Toyota Motor Engineering & ManufacturingSubmission Date :MAY 04, 2020NHTSA Recall No. :20E-029Manufacturer Recall No. :NR



#### **Manufacturer Information :**

Manufacturer Name : Toyota Motor Engineering & Manufacturing Address : 6565 Headquarters Drive Plano TX 75024 Company phone : 1-800-331-4331

### **Population :**

Number of potentially involved : 97,550 Estimated percentage with defect : 72 %

#### **Equipment Information :**

Brand / Trade 1 :	Joyson Safety Systems
Model :	Seatbelt Assembly
Part No. :	73***-****
Size :	NR
Function :	NR
Descriptive Information :	<ul> <li>(1) This issue only involves certain replacement seatbelt assemblies produced at JSS. (2) Although the involved equipment are within the above production range, not all equipment produced in this range have the noncompliance described below, because the production ranges are estimates based, in many instances, on the available information from the seatbelt assembly manufacturer. Note: Toyota estimates 72% of the equipment may have actually been sold with incorrect or missing instruction sheets based on the inspection results from a non-representative survey conducted of the parts that were in Toyota's service parts distribution centers during a certain time.</li> <li>Note: Please see the attached Part 573 Noncompliance Information Report for a complete list of part numbers for the affected equipment.</li> </ul>
Production Dates :	JUL 18, 1997 - FEB 25, 2020

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#### **Description of Noncompliance :**

Description of the Noncompliance :	In FMVSS No. 209, paragraph S4.1(k) requires that each seatbelt assembly, other than a seatbelt assembly installed in a motor vehicle by an automobile manufacturer, be accompanied by an installation instruction sheet. Paragraph
	S4.1 (l) requires a seatbelt or retractor assembly to include proper usage and maintenance instructions. Due to an improper packaging process at a specific supplier, certain replacement seatbelt assemblies may not have been packaged with an instruction sheet meeting these requirements, because the instruction sheet was missing or was an incorrect instruction sheet intended for a different seatbelt assembly. As a result, the subject equipment may not meet the requirements of FMVSS No. 209, paragraphs S4.1 (k) and (l).
FMVSS 1 :	209 - Seat belt assemblies
FMVSS 2 :	NR
Description of the Safety Risk :	Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.
Description of the Cause :	NR
Identification of Any Warning that can Occur :	NR

# **Involved Components :**

Component Name :	Please see attached Part 573 Report
Component Description :	Please see attached Part 573 Noncompliance Information Report
Component Part Number :	Please see attached Part 573 Noncompliance Information Report

#### **Supplier Identification :**

#### **Component Manufacturer**

Name : Joyson Safety Systems, Santa Rosa Plant

- Address : Carretera a Santa Rosa Km 3.5
  - Apodaca, N.L. México Carretera a Santa Rosa FOREIGN STATES C.P. 66600
- Country: Mexico

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#### **Chronology**:

When Toyota checked replacement seatbelt assemblies arriving from the supplier to Toyota's service parts distribution centers as a part of process improvement activities, it was discovered that that the installation instruction sheets may be missing or incorrect. Toyota then conducted inspections of seatbelt assemblies at its distribution centers and further investigated processes and inspection controls at the supplier. On April 28, 2020, based on the results of these investigations, Toyota determined that some affected seatbelt assemblies may have been sold without the instruction sheet or with an incorrect sheet and may not meet the requirements of FMVSS No. 209, paragraph S4.1 (k) and (l).

#### **Description of Remedy :**

Description of Remedy Program :	Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.
How Remedy Component Differs from Recalled Component :	Not Applicable
Identify How/When Recall Condition was Corrected in Production :	NR

#### **Recall Schedule :**

Description of Recall Schedule :	Pursuant to 49 U.S.C. 30118(d) and 30120(h), and the provisions of 49 CFR Part 556, Toyota intends to petition NHTSA for an exemption from the notification and remedy requirements of 49 U.S.C. Chapter 301 on the basis that this noncompliance is inconsequential to motor vehicle safety.
Planned Dealer Notification Date :	NR - NR
Planned Owner Notification Date :	NR - NR

#### **Purchaser Information :**

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : NR Address : NR NR Country : NR Company Phone : NR

\* NR - Not Reported