

TOYOTA MOTOR CORPORATION

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OFFICE DEFECTS INVESTIGATION

March 28, 1986

Mr. Philip Davis, Director
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: NEF-12ch, EA85-045

Dear Mr. Davis,

This in response to your letter of February 28, 1986 on the 1982 and 1983
Toyota Cressida's cruise control system.

If you have any technical questions concerning this matter, please contact our
Washington Branch Office at (202) 775-1707.

Sincerely,

TOYOTA MOTOR CORPORATION


Kenichi Kato
General Manager
U.S. Office

KK:cc
Enclosure

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This responds to your letter of February 18, 1986, in which you recommended that we conduct a voluntary safety recall on the 1982 and 1983 Cressida cruise control system.

1. There is no factual reason for us to initiate a safety recall of the Cressida cruise control system.

You made a reference in your letter that 35 of the total 40 Cressida complaints were received from 1982 and 1983 Cressida owners, and 5 alleged failures of the cruise control system. However, as you are aware, there is only one case where the existence of a problem was confirmed by Toyota or NHTSA. This single case was a cruise control computer observed at the NHTSA Vehicle Research & Test Center. In that case, NHTSA invited Toyota to witness the operation of a vehicle having been fitted with a cruise control computer removed from a complainant's vehicle. Although that cruise control computer operated incorrectly, Toyota was not given the opportunity to determine the cause of the computer's failure.

According to our analysis of the complaints, 6 out of the 35 complaints alleged cruise control malfunctions. One of these was observed at VRTC and 4 other complaints were investigated by Toyota and no defective cruise control systems were found. Of the remaining 29 cases, 21 were also checked by Toyota and no problems were found in the vehicle. In total, we were able to investigate 26 of 35 complaints and found no abnormalities on the vehicle other than the single case observed at VRTC.

Accordingly, we do not agree with your view that failure or malfunction of the cruise control computer is a common cause of sudden, unwanted accelerations. NHTSA's judgment was based only upon a single case and, neither NHTSA nor Toyota knows what failed in that case, nor do we know whether the failure was the result of a defect. Is it quite misleading to draw such a conclusion without identifying the causes of the remaining cases. NHTSA ignored the fact that all but one of the alleged problems have not been verified either by Toyota or NHTSA.

Also, Toyota does not agree with NHTSA's statement that the "malfunction of the defective cruise control computer appears to be intermittent." There is no such evidence. In fact, at VRTC, the computer malfunctioned every time it was turned on.

After about 30 or 40 seconds of full throttle actuation, the cruise control system released the throttle. (This was observed by disconnecting the throttle linkage, as no driver would be expected to tolerate 30 or 40 seconds of full throttle operation without turning off the cruise control.) Such operation can hardly be termed "intermittent."

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Because no identifiable common cause has been found, there is no justification for conducting a recall.

2. Toyota should have been allowed to investigate the failed computer before NHTSA sent us a recall request letter.

It appears to us that NHTSA believes that replacing the subject cruise computer with the one equipped with the latest fail-safe protection can solve the entire problem. We do not agree.

Generally, in order to solve any specific problem (including making a determination as to whether a recall campaign is necessary), first the failure mode, the cause of the problem and the condition under which it occurred must be identified. This is basic and a necessary process in solving the problem.

Drawing a conclusion without following this process could not result in a fundamental solution of the subject problem, rather it would only lead to non-cost effective and perhaps totally unnecessary action in the field imposing enormous unwarranted burdens on Toyota.

Therefore, without being given an opportunity to examine the failed computer, we cannot agree that recall is necessary.

3. Additional fail-safe protections were incorporated by Toyota's later generation cruise control systems, but not to address previous defects.

NHTSA implies that because later generation systems were designed with additional so-called "fail-safe" circuits, the earlier systems were defective. This is absurd. All manufacturers are constantly seeking ways to improve their products.

However, improvements made in production at relatively low cost are frequently prohibitively expensive for retrofit to existing vehicles. Such retrofit would require substantial justification, which does not exist in this case.

We can assure you that the product improvements made in our cruise control systems were not made as a result of discovery of design or manufacturing defects, but were incorporated to minimize the likelihood of danger should any kind of failure occur in the cruise control system.

If the view expressed in your letter were to prevail, how could any manufacturer improve the quality or reliability of his vehicles without incurring a recall obligation?

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If you expect any further action from Toyota, you must give us the opportunity to thoroughly examine the VRTC computer so that we may determine, if possible, the cause of its failure.

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