

November 25, 2020

NONCOMPLIANCE INFORMATION REPORT

1. Vehicle Manufacturer Name:

Toyota Motor Manufacturing Canada Inc. ["TMMC"]
1055 Fountain Street North, Cambridge, Ontario, Canada N3H 5K2

Toyota Motor Manufacturing, Kentucky, Inc. ["TMMK"]
1001 Cherry Blossom Way, Georgetown, KY, 40324

Affiliated U.S. Sales Company

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

Manufacturer of the Steering Column

NSK Steering Systems
2962 Fort Hudson Rd., Dyersburg, TN 38024
731-288-3000

2. Identification of Involved Vehicles:

Based on production records, we have determined the involved vehicle population to be the vehicles listed in the table below.

Make/Car Line	Model Year	Manufacturer	Production Period
Toyota / RAV4	2020	TMMC	July 10, 2020 through August 31, 2020
Toyota / RAV4 HV	2020	TMMC/TMMK	July 13, 2020 through August 11, 2020
Toyota / Avalon	2020 - 2021	TMMK	July 28, 2020 through August 20, 2020

Toyota / Avalon HV	2020	TMMK	July 24, 2020 through July 28, 2020
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Applicability	Part Number	Part Name	Component Description
Toyota / RAV4 Toyota / RAV4 HV	45250-07180	Column Assy, Steering M-Lock	Steering Column
Toyota / Avalon Toyota / Avalon HV	45250-07190	Column Assy, Steering E-Lock (Smart Key)	Steering Column

Note: (1) Although the involved vehicles are within the above production period range, not all vehicles in this range were sold in the U.S.

(2) Only vehicles in the above production range may have been equipped with steering columns that were manufactured with potentially damaged pins in the energy absorption bracket due to a specific production issue and are involved in this recall.

3. Total Number of Vehicles Involved:

Toyota RAV4:	133
Toyota RAV4 HV:	20
Toyota Avalon:	4
Toyota Avalon HV:	4
Total:	161

4. Percentage of Vehicles Estimated to Actually Contain the Noncompliance:

Unknown. Toyota is unable to provide an estimate of the percentage of vehicles to actually contain the defect. Whether the pins in the EA bracket in each steering column were damaged and may affect the performance of the driver airbag when it deploys depends on the press force used and the positioning of certain components during assembly of each affected steering column.

5. Description of Noncompliance:

The subject vehicles are equipped with steering columns that have an energy absorption bracket (EA bracket) which contains pins that are designed to breakaway to help reduce the severity of injury during certain collisions. There is a possibility that the pins were damaged during a specific step in the assembly process. If these pins are damaged, it may cause a reduction of the steering column breakaway force. This reduction in breakaway force can potentially affect the

performance of the driver airbag when it deploys. This may cause the vehicles not to meet certain performance requirements of FMVSS No. 208, paragraphs S5.1, S15.1, S15.2, and S17, resulting in an increased risk of injury to the driver during a crash necessitating airbag deployment.

6. Test Results and Other Information:

In Late-July 2020, a production team member at a Toyota facility identified an abnormality with the steering column during a functional check for the telescopic feature of the steering column. The assembly was recovered and sent to the supplier for investigation. The supplier investigated the recovered part and its production process and identified that the pins in the EA bracket for certain steering columns that were produced during a certain production period could be damaged because they may have been pressed into position with a press force that was higher than specified. Based on production records, Toyota began an activity to attempt to contain vehicles that were produced under the aforementioned conditions. However, not all suspect vehicles identified were contained. In addition, the supplier tested steering columns produced using different press forces and determined that the damage to the pins at a higher press force could result in a reduction of the steering column breakaway force. Based on this information, Toyota evaluated whether the reduction in breakaway force could affect the performance of the driver airbag when it deploys. On November 19, 2020 Toyota decided that the subject vehicles may have been sold with this condition and may not meet certain performance requirements of FMVSS No. 208, paragraphs S5.1, S15.1, S15.2, and S17.

7. Description of Corrective Repair Action:

For all involved vehicles, Toyota dealers will replace the steering column with a new one, at no cost to customers.

Reimbursement Plan for pre-notification remedies

As the owner notification letters will be mailed out well within the active period of the Toyota New Vehicle Limited Warranty (“Warranty”), all involved vehicle owners for this recall would have been provided a repair at no cost under Toyota’s Warranty.

8. Recall Schedule:

Notifications to owners of the affected vehicles will occur by January 24, 2021. A copy of the draft owner notification letter(s) will be submitted as soon as available.

9. Distributor/Dealer Notification Schedule:

Notification to distributors/dealers will be sent by November 25, 2020. Copies of the dealer communications will be submitted as they are issued.

10. Manufacturer's Campaign Number:

Interim/Remedy: 20TB17/20TA17