February 9, 2010

The Honorable Edolphus Towns, Chairman
The Honorable Darrell Issa, Ranking Minority Member
House Committee on Oversight and Government Reform
2157 Rayburn House Office Building
United States House of Representatives
Washington, DC 20515

Dear Chairman Towns and Ranking Member Issa:

The Committee on Oversight and Government Reform's hearing this week on the Toyota safety recalls offers an important opportunity to learn more about what went wrong, and perhaps more important, a chance to identify any needed reforms at the National Highway Traffic Safety Administration. To be clear, the Toyota case is about much more than engineering failure. It is a massive regulatory failure. One challenge confronting Congress is to determine how and why NHTSA failed to contain this problem after reports of safety failures began to surface several years ago. Did NHTSA lack sufficient statutory authority? Are its procedures too cumbersome to allow it to protect consumers in such instances? Did NHTSA leadership during the Bush or Obama Administrations lack the will to take on a major auto manufacturer?

From all accounts, Toyota has much to answer for, and we're confident your hearing will shine light on the company's behavior. But NHTSA must also account for its role in the matter, and Congress's examination of the affair should go beyond examining Toyota's actions. It must also determine what NHTSA knew, when it knew it, and how it responded. In particular, we suggest the Committee seek the answers to the following questions:

- **Is NHTSA overly reliant on voluntary recalls, even in such life-and-death circumstances as these? Should NHTSA be more aggressive in addressing safety problems preventively? What regulatory steps should NHTSA take to prevent a recurrence of the failures in the Toyota case?**

Congress provided NHTSA with preventive and remedial tools. Working prospectively, NHTSA has the authority to promulgate safety standards for motor vehicles.[1] Working retrospectively, the NHTSA can identify "defects" in the design or manufacture of motor vehicles and compel manufacturers and dealers to "recall" and repair them.[2] In many situations, including the current problems with Toyota cars, the agency does not exercise either power, depending instead on voluntary recalls by automobile manufacturers.

Ideally, NHTSA should anticipate potential problems and mandate solutions, such as computer system fail-safe measures that prevent crashes that happen as a result of malfunctioning control computers, a problem that news reports indicates may affect Toyota cars.[3] Congress should determine whether agency and judicial interpretations of NHTSA's authority are one reason why preventative efforts have stalled. The agency has relied on complicated design standards that try to affect how companies engineer a car, rather than performance standards that require high levels of safety performance. Judicial decisions have assigned the agency a burden of proof

[1] 49 U.S.C. §30111 (2000).
[2] *Id.* §30120.
[3] See http://www.nytimes.com/2010/02/05/business/05recall.html.

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concerning design standards that it has found very difficult to meet.[4]

Rather than exercising its recall authority, NHTSA usually waits for a manufacturer to agree to a recall. Congress should determine whether NHTSA's reliance on voluntary recalls indicates a failure of will or a problem with its statutory authority. The courts have interpreted the agency's recall authority in a manner that assists it in ordering recalls,[5] but NHTSA must follow burdensome and time-consuming recall procedures that can result in long delays.[6]

- **Does NHTSA's budget provide it with sufficient resources to ensure the safety of the 254 million passenger vehicles on the nation's roads?**

President Obama's budget request for NHTSA in FY2011 is $878 million, but of that total, fully two-thirds will be devoted to grants to the states that support driver misbehavior programs (drinking, texting, and problems with elderly drivers). In FY 2010, the president's proposal committed only $130 million to vehicle safety programs and only $40 million of that amount was applied to actual hands-on activities, including rulemaking and enforcement; comparable breakdowns are not available for FY2011.[7] In constant dollars, the NHTSA budget is millions short of its 1972 budget, soon after the agency was founded.

Disturbingly, accident injury rates have stopped declining in recent years, and traffic fatalities remain the number one cause of death for Americans between the ages of 4 and 34. Congress should examine whether NHTSA's current funding level, and specifically its funding for rulemaking and enforcement, is adequate to the task of protecting consumers. On life-and-death matters like these, it is simply unacceptable to rely on the good intentions of automobile manufacturers. NHTSA needs to get under the hood.

In the absence of vigorous enforcement by NHTSA, private lawsuits play a particularly vital role in compensating people injured or killed by defective vehicles while at the same time providing manufacturers with strong incentives to make safe cars. Toyota has estimated that it will lose approximately $2 billion from the sudden acceleration issue, due to the cost of fixing vehicles and from reduced sales, although that estimate probably does not include the costs of lawsuits filed on behalf of Toyota customers or emerging brake problems with the Prius. Precisely because Toyota faces such a large number of private liability lawsuits, the company has enormous financial incentives to convince NHTSA it has found an effective fix for accelerator and brake problems, bidding agency investigators farewell before they have an opportunity to plow through the company's records. Indeed, if history is any guide, we may well have to wait until those private lawsuits have wound through the courts before we discover any concrete evidence of who knew what when. Consider, for example, the Ford Pinto scandal that began in 1970. NHTSA closed several investigations of the problems with the car's rear gas tank design. The truth, that the company conducted a perverse cost-benefit analysis in which it calculated that an $11 fix to the problem was not worth the avoided deaths valued at $200,000/life—did not emerge until after plaintiffs' lawyers conducted court-enforced discovery.[8] It is important that all the facts emerge, and private lawsuits will play a key role in unearthing the truth. But Congress should also determine whether NHTSA needs stronger investigative powers so that it need not rely so

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[4] See Jerry L. Mashaw & David L. Harfst, *The Struggle for Auto Safety* (Cambridge, MA: Harvard University Press, 1990) (explaining the evolution of design standards and how judicial decisions have limited NHTSA's capacity to regulate).

[5] See United States v. General Motors Corp., 518 F.2d 420 (D.C. Cir. 1975) (holding that NHTSA can prove a defect with evidence of a significant number of failures even though it could not demonstrate the reason for the failures); United States v. General Motors Corp 561 F.2d 923 (D.C. Cir. 1977) (holding that NHTSA need only prove a defect could cause an "unreasonable risk of injury or death" and not that it has actually done so); United States v. Ford, 453 F. Supp. 1240 (D.D.C. 1978) (holding that NHTSA could use expert evidence to prove an "unreasonable risk of injury or death"); but see US v. General Motors Corporation, 841 F.2d 400 (D.C. Cir. 1988) (holding that NHTSA could not prove a defect based on consumer complaints when the manufacturer had engineering evidence that rebutted that a defect existed).

[6] See, e.g., Christopher Jensen, *Car Seat Recall Nearly 10 Year in the Making*, N.Y. TIMES, Feb. 4, 2010, available at http://wheels.blogs.nytimes.com/2010/02/03/car-seat-recall-nearly-10-years-in-the-making/.

[7] See http://www.dot.gov/budget/2010/2011budgethighlights.pdf (FY 2011 budget proposal); http://www.nhtsa.gov/staticfiles/DOT/NHTSA/Communication%20&%20Consumer%20Information/Articles/Associated%20Files/FY2010BudgetOverview.pdf (FY 2010 budget breakdown).

[8] See http://motherjones.com/politics/1998/03/ivey-memo-costbenefit-analysis-page-1 .

heavily on private litigation.

- **Will NHTSA pursue criminal enforcement against Toyota if the record justifies such prosecution? Does current law provide sufficient authority to pursue companies that behave with blatant disregard for consumer safety?**

As you know, Motor Vehicle Safety Act[9] includes criminal penalties for companies and individual executives who knowingly fail to inform NHTSA of a safety-related defect in a motor vehicle or motor vehicle equipment within a reasonable period of time if the defect causes death or serious bodily injury. Under regulations promulgated by NHTSA,[10] companies are allowed to create a "safe harbor" from criminal prosecution if they submit the report within 30 days after it was originally due.

These provisions, as well as an affirmative requirement that companies furnish timely notice of suspected defects, were added to the Motor Vehicle Safety Act in the wake of the Firestone tire scandal because the record in that case showed a pattern of reported tire failures preceding by several years any effort by Firestone to notify NHTSA regulators. Not only did the company fail to notify NHTSA in a timely and fully informative manner, NHTSA regulators ignored written alerts filed by State Farm regarding what the insurer regarded as an alarming number of claims linked to tire failures during these earlier periods.[11] In a similar vein, the *New York Times* has reported that in 1996, Toyota's slow response to a steering mechanism defect in the Hilux Surf prompted a rebuke from the Japanese government and an order that the company overhaul its recall system.[12] And in 2004, ABC News and the *New York Times* reported that Christopher Santucci, a former NHTSA employee who had joined Toyota, not only steered NHTSA away from investigating a problem with 2002-2003 Camrys, but admitted that the company deliberately withheld information because NHTSA investigators had not explicitly requested it.[13] Any similar foot-dragging or obfuscation by the company in this instance should be prosecuted to the full extent of NHTSA's authorizing statute not only because strong enforcement is a crucial deterrent to further negligence by Toyota or other manufacturers, but because consumers need to be reassured that NHTSA is not shirking its responsibilities to uphold these crucial reporting requirements aggressively.

- **Why does NHTSA continue to withhold from the public critical information regarding automobile defects?**

When it passed the 2000 Transportation Recall Enhancement, Accountability, and Documentation Act (TREAD Act) in the wake of the Firestone tire scandal, Congress directed NHTSA to gather important information from automobile manufacturers regarding potential vehicle defects as part of the Early Warning Reporting (EWR) program. NHTSA publishes some of this EWR data on its www.safercar.gov website. However, since 2003, NHTSA has withheld from the public much of the data it has collected claiming that the information constitutes "confidential business information." In 2007, NHTSA issued a rule formalizing this classification of information gathered via the EWR program.[14] The rule establishes that certain classes of EWR data—including data on the number of consumer complaints to the manufacturer, the number of field reports taken by company engineers and the number of claims involving death and injury—are exempt from the Freedom of Information Act (FOIA) and can therefore be kept from public view.

NHTSA's extraordinary decision to withhold data so critical to consumer decision-making data is wholly inconsistent with the Congress's goals in passing the TREAD Act. In establishing EWR, Congress intended to help raise awareness of automobile defects that might endanger public safety. It also intended that the EWR data be used to aid public oversight of manufacturer and NHTSA decisions on defects and recalls. These goals are defeated if

[9] 49 U.S.C. §30170.
[10] 49 C.F.R. §578.7
[11] See http://www.citizen.org/autosafety/suvsafety/ford_frstone/tab_075.pdf.
[12] See http://www.nytimes.com/2010/02/07/business/global/07toyota.html.
[13] See http://abcnews.go.com/Blotter/RunawayToyotas/revolving-door-us-safety-agency-toyota-representative/story?id=9747342; http://www.nytimes.com/2010/02/05/business/05recall.html?ref=global-home.
[14] 49 C.F.R. pt. 512 (2007).

NHTSA keeps entire classes of EWR information secret. Congress should examine NHTSA's practices in this regard, with an eye toward requiring the agency to make all EWR data public.
Attached to this letter is a timeline of the Toyota affair and NHTSA's response. The timeline illustrates regulatory dysfunction at its worst, as NHTSA often appears to be more concerned with responding to auto manufacturer demands by making crucial data confidential and limiting the scope of investigations than in protecting public safety. Thank you very much.

Sincerely,

Rena Steinzor
President, Center for Progressive Reform
Professor of Law, University of Maryland

Sidney Shapiro
Board Member, Center for Progressive Reform
Professor of Law, Wake Forest University

Enclosure: Timeline of NHTSA/Toyota

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Toyota Timeline to February 2010

Time	Event	Problem
2000	**Congress passes Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act of 2000**, which requires submissions of information by a manufacturer to NHTSA prior to the manufacturer's submission of a notice of a safety-related defect.[a] Manufacturers are also required to submit to NHTSA a true or representative copy of each communication, including technical service bulletins, to consumers, dealers, and parts dealers about a defect or noncompliance with a motor vehicle safety standard.[b] For the first time, the TREAD Act imposes a strong requirement that manufacturers notify NHTSA as soon as they discover potential defects in passenger vehicles, with noncompliance punishable by criminal penalties.	***NHTSA fails to enforce notification requirements effectively.***
2002	**2002 Camry designed on a new platform** – the ETCS-i system, which consists of an accelerator pedal sensor, a throttle control motor, a throttle position sensor and the engine control module. Toyota warns that the installation of a mobile two-way radio system could affect electronic systems.[c]	***No standard for computer system fail-safe measures.***
July 2002	Pursuant to the TREAD Act, NHTSA promulgates the Early Warning Reporting (EWR) rule,[d] requiring auto manufacturers, manufacturers of child restraints, and tire manufacturers to submit quarterly information – now referred to as "EWR data" regarding: • production numbers (cumulative total vehicles or equipment manufactured annually), • incidents involving death or injury based on claims and notices, • property damage claims, • consumer complaints, • warranty claims paid, and • field reports	
Aug 2002	Toyota issues a Technical Service Bulletin #TSB EG017-02, through NHTSA, for "engine surging" in 2002 Camrys: "Vehicles may exhibit a surging during light throttle input at speeds between 38-42 MPH…The Engine Control Module has been revised to correct this condition."	
May 2003	Toyota issues Technical Service Bulletin #TSB EG008-03 to address "engines surging" in 2003 Camry's: "Vehicles may exhibit a surging during light throttle input at speeds between 38-42 MPH…The Engine Control Module has been revised to correct this condition."	
July 2003	**NHTSA issues its "CBI Rule," determining certain Early Warning Data data should be withheld from the public because manufacturers claim it is "Confidential Business Information" (CBI)**.[e] The rule determines that the following EWR data is confidential: • production numbers (except light vehicles), • consumer complaints, • warranty claims, and • field reports	***Manufacturer efforts to keep potential defects secret enabled by NHTSA***
March 2004	**NTHSA investigates reports of unintended acceleration in 2002-2003 Camrys in incidents lasing only 1 second or less, a limit possibly influenced by a former NTHSA official joining Toyota.** According to media reports citing a lawsuit, the 1 second limit came after Christopher Santucci a former NHTSA official who left to work for Toyota, discussed the investigation with former NHTSA colleagues.[f] The *New York Times* reports that, in a deposition, Santucci said the company did not provide details of high-speed incidents because federal regulators had not requested them.[g] The NHTSA investigation found no defects. According to ABC News.com, a NHTSA employee wrote a memo dated March 23, 2004	***Revolving Door frustrates NHTSA Unintended Acceleration Investigation #1***

	concluding that "[l]onger duration incidents involving uncontrollable acceleration" were "not within the scope of this investigation." The memo was written after the employee, Scott Yon, met with two former NHTSA colleagues who worked for Toyota, including Chris Santucci.[h] ABC News also found that, "[26] of the 37 initial complaints of runaway Toyotas were excluded from the federal investigation in 2004 following the negotiations between the safety agency and the Toyota representatives." A later lawsuit alleges Toyota concealed potentially relevant complaints, including complaints that the acceleration lasted for a longer duration of time.[i]	
April 2004	**NHTSA amends the CBI Rule in its response to administrative petitions for reconsideration of the July 2003 rule and makes the following EWR data also confidential:** • Common green tire identifiers submitted by tire manufacturers (under FOIA Exemption 4); and • The last six (6) characters of vehicle identification numbers (VINs) contained in EWR death and injury reports (under FOIA Exemption 6).[j] Public Citizen subsequently files a lawsuit challenging NHTSA's confidentiality determinations.	***Manufacturer efforts to keep potential defects secret enabled by NHTSA***
Aug 2005	**NHTSA begins an investigation of sudden acceleration in 2002-2005 Camrys and Lexus ES vehicles.**[k] Toyota responds with a letter saying no defect trend exists and distinguishes between vehicles that suddenly "accelerated" and vehicles that "surged or lurched," saying these are separate issues.[l]	
Jan 2006	**NHTSA concludes that it could find no trend of a defect for sudden acceleration in 2002-2005 Camrys and Lexus ES vehicles.**	***NHTSA fails to act in response to Unintended Acceleration Investigation #2.***
March 2006	**The United States District Court for the District of Columbia upholds the agency's authority to promulgate the regulation making categorical confidentiality determinations for classes of EWR data, although it concludes that NHTSA had not provided adequate notice and an opportunity to comment on those determinations in the proposed rule.**[m] The Court remands the matter to NHTSA and later addresses in a supplemental opinion claims made by the Rubber Manufacturers Association the disclosure of EWR data was precluded by the disclosure provision in the TREAD Act and FOIA Exemption 3, which provides for the withholding of information when disclosure of that information is prohibited by another statute.[n] The District Court holds that the TREAD Act's disclosure provision was not an Exemption 3 statute. RMA appeals the District Court's judgment to the U.S. Court of Appeals for the District of Columbia Circuit (No. 06-5304), which affirms the lower court in 2008.[o]	***Manufacturer efforts to keep potential defects secret enabled by the courts.***
Sept 2006	**NHTSA begins an investigation of 2002-2006 Camry and Camry Solara vehicles for incidents related to vehicle surging.**[p] Toyota says the problem arose because of heavy weather conditions caused by flooded roads but modified the drain hose.	
March 2007	**NHTSA finds no defect with 2002-2006 Camrys and Camry Solaras.**	***NHTSA fails to act in response to Unintended Acceleration Investigation #3.***
March 2007	**NHTSA opens an investigation of 80,000 Lexus ES 350s for floor mat interference with the accelerator pedal.**[q]	***NHTSA fails to act in response to Unintended Acceleration Investigation #4.***

June 2007	**Toyota Vice President and former NHTSA employee, Chris Tinto, writes to NHTSA saying that the LEXUS "ES350 service brakes are more than adequate in stopping vehicle with a stuck throttle pedal."**[r] NHTSA later discover[s] that, "when the Lexus ES 350's throttle is stuck open, it can be very difficult to stop the car using the brakes."	***Revolving Door feeds distracting and discredited information to NHTSA.***
Aug 2007	**NHTSA opens an engineering investigation of 2007 Lexus ES-350 vehicles to determine causes of unintentional acceleration.** According to the *Washington Post*, "investigators found that at least three of every 100 Lexus ES 350 owners in Ohio reported experiencing unintended acceleration, an unacceptably high percentage given the potentially fatal consequences…but the investigation only partially identified the cause of the problem, and, moreover, concluded it only affected a relatively small number of cars."[s]	***NHTSA fails to act in response to Unintended Acceleration Investigation #5.***
Sept 2007	**Toyota recalls 55,000 2007 and 2008 Camry and Lexus ES models for floor mat interference.**[t]	
Oct 2007	**NHTSA issues final CBI rule, concluding the following EWR data is confidential:** • production numbers (other than for light vehicles), • the numbers of consumer complaints, • the numbers of warranty claims (warranty adjustments in the tire industry), • the numbers of field reports, • copies of field reports, • common green tire identifier information, and • the last six (6) characters of the vehicle identification numbers (VINs) which are reported in certain EWR submissions involving deaths and injuries.	***Manufacturer efforts to keep potential defects secret enabled by NHTSA.***
Jan 2008	**NHTSA begins investigation of 2006-2007 Tacomas for unintended acceleration.**[u]	***NHTSA fails to act in response to Unintended Acceleration Investigation #6.***
2008	**Former Toyota lawyer, who defended product liability cases for Toyota from 2003 to 2008, alleges in a federal lawsuit that the automaker has a long history of hiding and destroying evidence, a strategy organized from company headquarters in Japan.**[v]	
April 2008	**NHTSA issues a report ruling out any problem with the Lexus ES 350's electronic control system.**[w] According to ABC News.com, Clarence Ditlow, director of the Center for Auto Safety, asked NHTSA for specific details on how it tested the electronic system. The government's written response: "We searched for, but found no records relating to or describing test protocols."	
April 2008	**NHTSA begins investigation of 54,000 2004 Toyota Siennas for unintended acceleration.**	***NHTSA fails to act in response to Unintended Acceleration Investigation #7.***
Aug 2008	**NHTSA concludes there is no trend for unintended acceleration in Tacomas.**	
Aug 2008	**NHTSA upgrades its Sienna investigation to an Engineering Analysis.**[x]	
Dec 2008	**Toyota receives complaints from customers in Europe about sticking accelerator pedals.**[y]	***Unknown if Toyota reported the European complaints to NHTSA.***
Aug 2008	**Toyota begins replacing accelerator pedals in Europe.**[z]	
Jan 2009	**NHTSA closes its Sienna investigation after Toyota agrees to recall vehicles built between Jan. 10, 2003 and June 11, 2003.**[aa]	

Aug 2009	**Fatal Saylor crash in California where off-duty highway state trooper cannot control his Lexus ES350.**	
Sept 2009	**Toyota issues safety advisory, warning consumers to remove floor mats in 2007 through 2010 Camrys and Lexuses.[bb]**	
Oct 2009	**Toyota recalls 3.8 million Toyota and Lexus vehicles because the floor mats could trap the gas pedal.[cc]**	
Nov 2009	**NHTSA disputes Toyota's characterization of the recall as indicating the investigation is over, stating "the removal of mats is simply an interim measure, not a remedy of the underlying defect in the vehicles…."**	
Nov 2009	**Toyota announces plans to reconfigure the accelerator pedal on vehicles going back to 2004.**	
Dec 2009	**DOT officials fly to Japan to "remind Toyota management about its legal obligations."[dd]**	
Jan 2010	**Toyota recalls 2.3 million U.S. vehicles for a defect that can cause the accelerator pedal to stick.** **Toyota suspends sales of eight models with accelerator pedals that can stick.** **Toyota adds 1.09 million models to the floor mat recall.[ee]**	
Feb 2010	**NHTSA opens investigation of Prius brakes.**	

[a] *See* 49 U.S.C. 30118(c)
[b] 49 U.S.C. 30166(f)
[c] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[d] 67 FR 45822 (July 10, 2002).
[e] Confidential Business Information (CBI). 49 CFR Part 512, 68 FR 44209 (July 28, 2003).
[f] http://www.freep.com/article/20100128/BUSINESS01/1280466/Camry-red-flag-raised-in-2004
[g] http://www.nytimes.com/2010/02/05/business/05recall.html?ref=global-home
[h] http://abcnews.go.com/Blotter/RunawayToyotas/revolving-door-us-safety-agency-toyota-representative/story?id=9747342
[i] http://www.wvrecord.com/news/224331-trio-says-toyota-engines-accelerate-on-their-own
[j] www.wvrecord.com/printer/article.asp?c+224331
[k] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[l] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[m] *Public Citizen, Inc. v. Mineta*, 427 F. Supp. 2d 7, 12-14 (D.D.C. 2006).
[n] *Public Citizen, Inc. v. Mineta*, 444 F. Supp. 2d 12 (D.D.C. 2006).
[o] *Public Citizen, Inc. v. Rubber Manufacturers Ass'n*, 533 F.3d 810 (D.C. Cir. 2008).
[p] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[q] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[r] http://www.washingtonpost.com/wp-dyn/content/article/2010/02/04/AR2010020404750.html
[s] http://www.washingtonpost.com/wp-dyn/content/article/2010/02/03/AR2010020304056.html?hpid=topnews
[t] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[u] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[v] http://www.freep.com/article/20100204/BUSINESS01/2040470/1319/
[w] http://abcnews.go.com/Blotter/RunawayToyotas/toyota-nhtsa-looked-sudden-acceleration-years-ago/story?id=9747426
[x] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[y] http://www.nytimes.com/2010/02/07/business/global/07toyota.html
[z] http://www.nytimes.com/2010/02/07/business/global/07toyota.html
[aa] http://www.safetyresearch.net/toyota-sudden-unintended-acceleration/toyota-sudden-acceleration-timeline/
[bb] www.wvrecord.com/printer/article.asp?c+224331
[cc] www.usatoday.com/money/autos/2010-02-02-toyotatiming02_VA_N.htm
[dd] http://www.cnn.com/2010/POLITICS/02/02/lahood.toyota.recall/index.html
[ee] www.usatoday.com/money/autos/2010-02-02-toyotatiming02_VA_N.htm