

Published Date: June 30, 2016

To: All Toyota Dealer Principals, General Managers, Service Managers, and Parts Managers

Subject: Customer Support Program (CSP) - ZG2/ZG3
(Class Action Settlement for Corson v. Toyota Motor Sales, U.S.A., Inc)
Certain 2009 – 2010 Model Year Corolla vehicles
Electric Power Steering System

On April 6, 2016 a settlement of claims in a class action lawsuit involving certain 2009 and 2010 Toyota Corolla vehicles (excluding the XRS grade) equipped with an electric power steering system was approved.

Background:

The class action settlement relates to certain 2009 and 2010 Toyota Corolla vehicles (excluding the XRS grade) equipped with an electric power steering (EPS) system, which has been alleged to “cause vehicles to wander or drift from center at highway speeds and/or suddenly veer to one direction during normal use.” Toyota denies these allegations and believes the concerns raised in the lawsuit are about customer preference for on-center steering feel in the vehicles.

Toyota has determined that turning the page on this legal issue is in the best interests of the company and its employees, dealers and customers. In keeping with its core principles, Toyota has structured this agreement in ways that work to put customers first. This CSP was created as part of the implementation of the settlement.

CSP Coverage:

This CSP has three different categories of customer relief as follows:

- a) The no cost installation of a re-tuned electronic control unit ("Re-Tuned ECU") for eligible class members who would prefer an alternative on-center steering feel and from whom Toyota Motor Sales, U.S.A., Inc. has received a complaint about their Subject Vehicle's on-center steering feel;
- (b) A fifty (50) percent discounted installation of the Re-Tuned ECU for eligible class members who would prefer an alternative on-center steering feel; or
- (c) Reimbursement up to \$695.00 for eligible class members who already paid to have a Re-Tuned ECU installed in their Subject Vehicles.

Customers who opted in and are eligible for installation of the Re-Tuned ECU were provided a notification/voucher from the settlement administrator for either a 50% coverage (ZG3) or a 100% coverage (ZG2). **Customers eligible for this program must request service prior to April 6, 2017.**

Toyota has loaded VINs into the TIS vehicle inquiry system according to the following classification for ease of dealer identification.

Coverage Category	TIS Designation	Coverage	UIO
A	ZG2	100% Part and Labor	34
B	ZG3	50% Part and Labor	4,224

Important Notes:

- *The settlement does not cover additional costs associated with services such as vehicle alignment and such services are not required for settlement benefit eligibility.*
- *Customers are entitled to the original ECU removed from their vehicles, in the event they desire to have it re-installed at a future date. Discuss with customers if they would like to have the original ECU provided to them. If customers request re-installation of the original ECU, the cost of doing so is their responsibility.*

The following information is provided to inform you and your staff of the program notification schedule and your degree of involvement.

Notification/Voucher Sent To Eligible Customers

In approximately mid-June 2016, the settlement administrator will notify customers who are eligible for either no cost or discounted installation of the Re-Tuned ECU that they may begin to request installation under the CSP. A sample of the notification letter has been included for your reference.

Technician Training Requirements

The service quality of covered vehicles is extremely important to Toyota. All dealership technicians performing this installation are required to successfully complete the most current version of the E-Learning course "Safety Recall and Service Campaign Essentials." To ensure that all vehicles have the installation performed correctly; technicians performing this installation are required to currently hold at least one of the following certification levels:

- Certified Electrical
- Expert Electrical
- Master Technician
- Master Diagnostic Technician

Always check which technicians can perform the CSP by logging on to <https://www.uotdealerreports.com>. It is the dealership's responsibility to select technicians with the above certification level or greater to perform this CSP. Carefully review your resources, the technician skill level, and ability before assigning technicians to this CSP. It is important to consider technician days off and vacation schedules to ensure there are properly trained technicians available to perform this CSP at all times.

Remedy Procedures

Dealerships should utilize the technical instructions found in the repair manual. [Technical Instructions](#)

Parts Ordering Process - Non SET and GST Parts Ordering Process

Due to potentially limited availability, the parts may have been placed on either Manual Allocation Control (MAC) or Dealer Ordering Solutions (DOS). As the parts inventory changes, the ordering process may change. Please check the Toyota Special Activities MAC/DOS report on Dealer Daily for the most up-to-date parts ordering information.

Dealers are requested to only order parts for vehicles eligible for this Customer Support Program.

Refer to Warranty Policy Bulletin POL16-05 for additional parts ordering information.

All Customer Support Program (CSP) parts are eligible for the Monthly Parts Return Program. Please refer to PANT Bulletin 2011-087 for campaign parts that are currently returnable under the Monthly Parts Return Program and for additional details.

Dealer Reimbursement Procedure

Refer to the Warranty Policy Bulletin POL16-05 for warranty claim processing instructions. *All parts replaced for this installation are subject to warranty part recovery.*

Customer Reimbursement

Customers who previously paid for the installation were required to submit a claim to the settlement administrator by March 15, 2016 for reimbursement consideration. Those customers who are eligible for reimbursement will be provided a check by the settlement administrator. If customers have questions regarding the status of their reimbursement request, please have them contact the settlement administrator at 877-880-8814

Customer Contacts

Customers who receive the owner letter may contact your dealership with questions regarding the letter and/or the Customer Support Program. Please welcome them to your dealership and answer any questions that they may have. A Q&A is provided to assure a consistent message is communicated.

Customers with additional questions or concerns may visit the settlement website at www.CorollaECUSettlement.com or may contact the Settlement Administrator at 877-880-8814.

Media Contacts

It is imperative that all media contacts (local and national) receive a consistent message. In this regard, all media contacts must be directed to Cindy Knight (310) 468-2170 in Toyota Corporate Communications. (Please do not provide this number to customers. Please provide this contact to only media associates.)

Please review this entire package with your Service and Parts staff to familiarize them with the proper step-by-step procedures required to implement this Customer Support Program.

Thank you for your cooperation.
TOYOTA MOTOR SALES, U.S.A., INC.



**Customer Support Program (CSP) – ZG2/ZG3
 (Class Action Settlement for Corson v. Toyota Motor Sales, U.S.A., Inc)
 Certain 2009 – 2010 Model Year Corolla vehicles
 Electric Power Steering System**

**Frequently Asked Questions
 Published June 30, 2016**

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Toyota has determined that turning the page on this legal issue is in the best interests of the company and its employees, dealers and customers. In keeping with its core principles, Toyota has structured this settlement in ways that work to put customers first. This CSP was created as part of the implementation of the settlement.

Q1: What are the parameters of the CSP?

A1: This CSP has three different categories of customer relief as follows:

- (a) The no cost installation of a re-tuned electronic control unit ("Re-Tuned ECU") for eligible class members who would prefer an alternative on-center steering feel and from whom Toyota Motor Sales, U.S.A., Inc. has received a complaint about their Subject Vehicle's on-center steering feel;
- (b) A fifty (50) percent discounted installation of the Re-Tuned ECU for eligible class members who would prefer an alternative on-center steering feel; or
- (c) Reimbursement up to \$695.00 for eligible class members who already paid to have a Re-Tuned ECU installed in their Subject Vehicles.

Customers who opted in and are eligible for installation of the Re-Tuned ECU under this settlement were provided a notification/voucher from the settlement administrator for either a 50% coverage (ZG3) or a 100% coverage (ZG2). **Customers eligible for this CSP must request service prior to April 6, 2017.**

Toyota has loaded VINs into the TIS vehicle inquiry system according to the following classification for ease of dealer identification.

Coverage Category	TIS Designation	Coverage	UIO
A	ZG2	100% Part and Labor	34
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Important Note: The CSP does not cover additional costs associated with services such as vehicle alignment and such services are not required for settlement benefit eligibility.

Q1a: How much will installation of the Re-Tuned ECU cost?

A1a: The estimated cost of installing the Re-Tuned ECU is \$695. Please note this is only an estimate and the actual cost may vary depending on the labor rates in your geographic area.

Q2: *Is the procedure for this CSP the same as outlined in Technical Service Bulletin T-SB- 0140-10?*

A2: The only procedure performed as part of this CSP is installation of the Re-Tuned ECU. The TSB 0410-10 included other procedures that are not included as part of this CSP. If you wish to have other procedures performed, aside from having the Re-Tuned ECU installed, then you will be responsible for paying for those services.

Q2a: *Will my vehicle require alignment before having this CSP performed?*

A2a: No, it is not required for the vehicle to have an alignment performed before installing the Re-Tuned ECU. However, Toyota recommends you periodically have your alignment checked in accordance with the recommended maintenance schedule to ensure it is within specification. If vehicle alignment is out of specification it may affect vehicle handling characteristics.

Q2b: *What if my vehicle requires alignment or other services?*

A2b: The CSP does not cover additional costs associated with services such as vehicle alignment. Such services do not need to be performed before the Re-Tuned ECU is installed. If you choose to have your alignment inspected or any other additional services performed the cost associated with these services will be your responsibility.

Q3: *How long will the installation take?*

A3: The installation takes approximately 1.5 hours; however, depending upon the dealer's work schedule, it may be necessary to make the vehicle available for a longer period of time.

Q4: *Do I need the notification/voucher the settlement administrator provided to have the installation performed?*

A4: No, Toyota dealerships will be able to determine whether your vehicle is entitled to the discounted or no cost installation based on the Toyota VIN inquiry system. The notification/voucher is not required at the time of installation.

Q5: *I had the installation performed and I preferred the original steering feel, why?*

A5: The Re-Tuned ECU that is being offered as part of the CSP provides an alternative steering feel for those customers who are dissatisfied with the original on-center steering feel. Additionally, please note the vehicle's handling characteristics could be affected by other factors such as improper vehicle alignment, tire pressure, worn/loose suspension, issues with other steering components, and environmental conditions, such as road surface and wind.

Q5a: *I am dissatisfied with the Re-Tuned ECU, can I have a refund?*

A5a: No, Toyota will not provide a refund if you elect to have the installation performed and are dissatisfied with the steering feel after replacement of the Re-Tuned ECU.

Q5b: *I am unsure I will like the steering feel of the Re-Tuned ECU, will the dealer provide me the old ECU if I have the installation performed?*

A5b: Yes, if you have the Re-Tuned ECU installed, you may request that the dealer provide you the original ECU that was removed from the vehicle.

Q5c: *Can I have the original ECU re-installed?*

A5c: If you elect to have the original ECU re-installed at any time, you will be responsible for the associated costs.

Q6: *What if I previously paid to have the Re-Tuned ECU installed?*

A6: Customers who previously paid for the installation were required to submit a claim to the settlement administrator by March 15, 2016 for reimbursement consideration. Those customers who are eligible for reimbursement will be provided a check by the settlement administrator. If you have questions regarding the status of your reimbursement request please contact the settlement administrator at 877-880-8814.

Q7: *What if I have additional questions or concerns regarding the settlement?*

A7: If you would like additional information regarding the settlement you can visit www.CorollaECUSettlement.com or contact the settlement administrator at 877-880-8814.

Q8: *How does Toyota obtain my mailing information?*

A8: Toyota uses an industry provider who works with each state's Department of Motor Vehicles (DMV) to receive registration or title information, based upon the DMV records. Please make sure your registration or title information is correct.

«ClaimID»

**NOTIFICATION FOR A NO COST INSTALLATION OF
THE RE-TUNED ELECTRONIC CONTROL UNIT**

You are receiving this Notification because you are a Class Member in the *Corson, et al. v. Toyota Motor Sales, U.S.A., Inc., et al.* lawsuit. You timely submitted a valid Claim Form, which entitles you to have the re-tuned electronic control unit (“Re-Tuned ECU”) installed in your 2009 or 2010 Toyota Corolla by any authorized Toyota Dealer at no cost, subject to the terms and conditions that you acknowledged and agreed to in your submitted Claim Form. Under the Settlement Agreement, the Toyota Dealer is only responsible for installing the Re-Tuned ECU, and if the Toyota Dealer performs any other services, tests or repairs on your vehicle, you are solely responsible for the payment for all such services, tests or repairs.

To take advantage of this offer, you **must** contact and request from an authorized Toyota Dealer, no later than **April 6, 2017**, that this procedure be performed on your vehicle

Claim Identification Number: «ClaimID»

VIN (last 4 digits): «Last4VIN»

Corson v. Toyota Motor Sales, U.S.A. Settlement Administrator
P.O. Box 43388
Providence, RI 02940-3388

Notification for a No Cost Re-Tuned ECU

«Barcode»

Postal Service: Please do not mark barcode

Claim#: TYS-«ClaimID»-«MailRec»

«First1» «Last1»

«CO»

«Addr2»

«Addr1»

«City», «St» «Zip»

«Country»

TYS

Corson v. Toyota Motor Sales, U.S.A. Settlement Administrator
P.O. Box 43388
Providence, RI 02940-3388

Notification for a Discounted Re-Tuned ECU

«Barcode»

Postal Service: Please do not mark barcode

Claim#: TYS-«ClaimID»-«MailRec»

«First1» «Last1»

«CO»

«Addr2»

«Addr1»

«City», «St» «Zip»

«Country»

TYS

«ClaimID»

**NOTIFICATION FOR A 50% DISCOUNTED INSTALLATION
OF THE RE-TUNED ELECTRONIC CONTROL UNIT**

You are receiving this Notification because you are a Class Member in the *Corson, et al. v. Toyota Motor Sales, U.S.A., Inc., et al.* lawsuit. You timely submitted a valid Claim Form, which entitles you to have the re-tuned electronic control unit (“Re-Tuned ECU”) installed in your 2009 or 2010 Toyota Corolla by any authorized Toyota Dealer for a fifty (50) percent discount, subject to the terms and conditions that you acknowledged and agreed to in your submitted Claim Form. The total cost is currently estimated to be approximately \$695.00. Please note that the actual total cost may differ from the estimated total cost depending on the labor rates in your area. Under the Settlement Agreement, the Toyota Dealer is only responsible for installing the Re-Tuned ECU, and if the Toyota Dealer performs any other services, tests or repairs on your vehicle, you are solely responsible for the payment for all such services, tests or repairs.

To take advantage of this offer, you **must** contact and request from an authorized Toyota Dealer, no later than **April 6, 2017**, that this procedure be performed on your vehicle.

Claim Identification Number: «ClaimID»

VIN (last 4 digits): «Last4VIN»