



June 18, 2012

**SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
400 7th Street, S.W.
Washington, D.C. 20590

Gentlemen:

Cooper Tire & Rubber Company has decided that a non-compliance which relates to motor vehicle safety exists in four hundred and forty-eight (448) tires as set forth in the attached Defect and Noncompliance Information Report dated May 30, 2012.

These tires are being voluntarily recalled.

A copy of this letter, with attachments, is being faxed to the Office of Defects Investigation (ODI) for review by ODI of the proposed owner notification letters pursuant to 49 CFR Section 573.6(c)(10). We are asking ODI to approve the sample owner letters. Hard copy will follow. Unless advised otherwise by ODI, owner notification will begin June 27, 2012. Three copies of the appropriate notification to dealers and customers are attached as exhibits in response to Item 9 of the Defect and Noncompliance Information Report.

Our envelope format for owner recall notification letters as required under 49 CFR 577.5(a) has been previously approved by ODI.

Cooper Tire (for Del-Nat Tire) will provide the required quarterly report on the status of the above-mentioned campaign.

Please advise of the NHTSA assigned campaign number.

Very truly yours,

Brooke Ott

Attachments

cc: Office of Defects Investigation "NSA-10"
Department of Transportation
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
400 7th Street, S.W.
Washington, D.C. 20590
Fax Number 202/366-7882
Attn: Mr. George Person
Recall Management Regulations

DEL-NAT TIRE CORPORATION
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: 6/18/2012

NHTSA CAMPAIGN NO.

DEL-NAT NO. DN-12-0618

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

BRAND NAME

OWNER

NATIONAL A/S COMMANDO

DELNAT TIRE CORPORATION

2. POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
265/70R17 Standard Load Tubeless Radial tires			
NATIONAL A/S COMMANDO	UT1YWHA0112 Jan. 1, 2012 – Jan. 7, 2012	98	≤ 2.0%

3. TOTAL UNITS POTENTIALLY AFFECTED: 98

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: ≤ 2.0%

DEL-NAT TIRE CORPORATION
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

5. **DESCRIPTION OF DEFECT OR NONCOMPLIANCE** (Including brief summary and detailed description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

The affected tires may contain an unauthorized stock in the tread. The presence of this material may precipitate the formation of voids which could result in early life tread separations.

6. **CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT** (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

Cooper has received reports from several dealers regarding the subject tires developing early life tread separations when placed in service.

Cooper launched an internal investigation to determine what occurred and what tires were affected. The result of this investigation indicated that on December 12, 2011 and again on January 4, 2012 a project extrusion was run on the tread line. When completed, the extruder head was not properly converted back to production configuration which resulted in a small amount of non-standard stock being "mixed" with the specified tread stock. Based upon Cooper's review of production data, Cooper estimates that a small percentage of tread was suspect and used to produce tires.

Compound reconstruction analysis conducted on adjusted tires provided conclusive evidence that the non-standard stock did pass through the extruder during these production runs of tread.

Our inventory has been completely sorted for these tires. We received 98 tires from Cooper Tire & Rubber Company of which we have accounted for 0 tires in our warehouses. There were 98 tires distributed and we are voluntarily recalling these 98 tires.

7. **COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:**

This action was initiated based on our field adjustment data, property damage claims data, and our internal review of production data.

8. **STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:**

Tires with the affected DOT serial week and year identification numbers should be shipped to one of Cooper Tire's Inspection Center. All tires returned will be inspected for the correct DOT identification number and all tires found to have the affected DOT serial numbers will be scrapped.

The tires located in our inventory count reconciliation will also be scrapped.

9. **ENCLOSURES, IF ANY** (Three copies of all notices, bulletins and other communications that were sent to more than one distributor, dealer or purchaser and relate directly to the defect or noncompliance):

DEL-NAT TIRE CORPORATION
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: 5/30/12

NHTSA CAMPAIGN NO.

DEL-NAT NO. DN-12-0618

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

BRAND NAME

OWNER

DELTA A/S SIERRADIAL

DELNAT TIRE CORPORATION

2. POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
265/70R17 Standard Load Tubeless Radial tires			
DELTA A/S SIERRADIAL	UT1YWHD0112 Jan. 1, 2012 – Jan. 7, 2012	350	≤ 2.0%

3. TOTAL UNITS POTENTIALLY AFFECTED: 350

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: ≤ 2.0%

5. DESCRIPTION OF DEFECT OR NONCOMPLIANCE (Including brief summary and detailed

DEL-NAT TIRE CORPORATION
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

The affected tires may contain an unauthorized stock in the tread. The presence of this material may precipitate the formation of voids which could result in early life tread separations.

6. CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

Cooper has received reports from several dealers regarding the subject tires developing early life tread separations when placed in service.

Cooper launched an internal investigation to determine what occurred and what tires were affected. The result of this investigation indicated that on December 12, 2011 and again on January 4, 2012 a project extrusion was run on the tread line. When completed, the extruder head was not properly converted back to production configuration which resulted in a small amount of non-standard stock being "mixed" with the specified tread stock. Based upon Cooper's review of production data, Cooper estimates that a small percentage of tread was suspect and used to produce tires.

Compound reconstruction analysis conducted on adjusted tires provided conclusive evidence that the non-standard stock did pass through the extruder during these production runs of tread.

Our inventory has been completely sorted for these tires. We received 350 tires from Cooper Tire & Rubber Company of which we have accounted for 0 tires in our warehouses. There were 350 tires distributed and we are voluntarily recalling these 350 tires.

7. COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:

This action was initiated based on our field adjustment data, property damage claims data, and our internal review of production data.

8. STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:

Tires with the affected DOT serial week and year identification numbers should be shipped to one of Cooper Tire's Inspection Centers. All tires returned will be inspected for the correct DOT identification number and all tires found to have the affected DOT serial numbers will be scrapped.

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