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 MERITAS LAW FIRMS WORLDWIDE

July 18, 2007

Michael Kidney, Esq.  
Hogan & Hartson LLP  
Columbia Square  
555 Thirteenth Street  
Washington, DC 20004

Re: Re: NHTSA Recall No: 07-003

Dear Mr. Kidney:

As you know the undersigned as well as my client met with various representatives of NHTSA on Friday, July 13, 2007. During that meeting we advised NHTSA that we needed additional information from your client Hangzhou Zhongce Rubber Company, Ltd., ("HZ"). It was suggested by Ron Medford, Senior Associate Administrator, Vehicle Safety, that we contact you to see if we can receive the information we need in advance of your client's responding to NHTSA's information request ("IR").

First, could you provide us with any of the documents you will be providing to NHTSA that you have thus far collected including all testing results (more specific below), as well as sales documents indicating sales of CR857, CR860 and CR861 tires by HZ to anyone in the United States. Additionally, if you could provide us with the dates that such tires were sold to each of the entities that you identify, that would be greatly appreciated.

In your July 11, 2007 letter to NHTSA you have identified three design phases which the subject tires allegedly went through. It appears then that the tire design/construction was in fact changed by HZ. Please provide any communication that HZ claims it had with FTS wherein HZ advised FTS of any design or construction changes. We will utilize your nomenclature in making the specific requests we make herein.

With regard to Phase I Design, please identify what gauge gum strips were utilized throughout the Phase I Design which has been identified as lasting from January 2002 to the fourth week of January 2004. We are concerned since a tire with a DOT code ending in 0202 was sectioned by FTS' engineer and found to have a gum strip less than .6mm. Please explain how if the design was not changed until January 2004, this could be. Would you also identify how many tires of the so called Phase I Design were imported to the United States? Additionally, would you please provide us with the number of so-called Phase I Design tires that were sold by HZ to FTS?

Please identify the gauge of the gum strip that was used in all Phase I tires. It is our understanding that at some point this was changed from 0.6mm to 0.3mm. Please provide all specifications and construction sheets reflecting this or any other changes to the gum strip gauge.

With regard to the alleged Phase II Design, would you please provide us with any information indicating that HZ began examining alternative belt edge designs. Additionally, it is our understanding that the 2 +7 x .028 mm HT wire that was used in the Phase Two Design was a change from the original 3 + 9 wire. Would you kindly provide all documents which indicate when the change was made and any document as to why the change was made.

Your letter also indicates that the rubber between the belt edges, (i.e., the thickness of the rubber layer between the belts) in Phase II was increased over that of Phase I. Please provide all documents regarding this especially those reflecting the change and the specific dimensions. Also provide the dates in which any changes were made.

Kindly provide the finite element analysis ("FEA") identified in your letter. Additionally, kindly provide all testing reports on the prototype Phase II tires manufactured without the C shape wrap-around gum strip. Your letter speaks in terms of "design testing." Kindly describe this design testing and provide us with all test reports and exhibits.

Your letter indicates that thicker belt wire in combination with "thicker total belt package," created a superior "belt to belt bonding" than in the earlier tires. Kindly provide any empirical data to support that statement. We are specifically requesting copies of any durability tests done on these Phase II tires. Please identify the date that any and all such tests were done and provide all test reports.

Your letter continues that the Phase II Design was tested and compared to the Phase I Design. Kindly identify the nature of those tests and produce copies

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of all test reports that are not produced pursuant to any other request contained herein.

Your letter further indicates that high speed and endurance testing was performed. Kindly provide copies of all such endurance testing.

Kindly identify all U.S. purchasers of Phase II Design tires at any time.

With regard to Phase III, kindly set forth the gauge of the "web-shaped gum strip" utilized by HZ. Also provide the dimension of the rubber between the belts. Kindly identify and provide copies of all FMVSS 139 High Speed Performance and Endurance Testing regarding Phase III tires.

Lastly, your letter indicates that the Phase III tires were the "highest performing of the three subject designs." In addition to any FMVSS compliance testing which your client believes establishes this, please provide any other testing or analysis done by HZ to determine the relative performance of the Phase III tires with regard to durability and endurance.

Lastly, kindly provide us with the number of Phase III design tires imported to the United States. Also identify all U.S. purchasers of that design.

Your July 11, 2007 letter (page 4) indicates that the original design and each design enhancement was subjected to durability testing. Kindly provide all durability testing on each of the designs. Also, please provide all specifications for any changes made to any HZ LTR tires model CR857, CR860 and CR861. Also include such documentation as it results to CR861a since it is essentially the same tire as CR861.

Your immediate response will be greatly appreciated.

Very truly yours,  
Norris, McLaughlin & Marcus



Lawrence N. Lavigne

cc: Richard Kuskin  
George Person, NHTSA