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July 10, 2007

Kathleen C. DeMeter, Director
Office of Defects Investigation
Enforcement
U.S. Dept. of Transportation – NHTSA
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Foreign Tire Sales, Inc.
Recall No. 07T-003
NVS-210

RECEIVED
JUL 11 11 11 AM '07
U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF DEFECTS INVESTIGATION
ENFORCEMENT

Dear Ms. DeMeter:

Please accept this letter in response to the information request from The Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) dated June 27, 2007. This letter replies to requests 1-4. The remaining requests shall be responded to by July 30, 2007.

FTS understands this request to involve light truck radial tires (“LTR”) in the Westlake, Compass and YKS brand names* in the sizes and designations set forth below, manufactured by Hangzhou Zhongce Rubber Co. LTD (“HZ”). FTS did not import any LTR tires from HZ in any other brands. FTS has responded to these requests based on this understanding.

<u>Size</u>	<u>Models</u>
LT235/75R-15	CR861, CR857
LT225/75R-16	CR861
LT235/85R-16	CR860, CR861, CR857
LT245/75R-16	CR860, CR861, CR857
LT265/75R-16	CR860, CR861, CR857
LT31X10.5 R-15	CR857, CR861

All of the information provided herein was last gathered between June 29, 2007 and July 9, 2007.

Responses:

1. Separately, by each tire brand name, model and tire size of the subject tires, state the number of subject tires produced by HZR that FTS imported in each calendar quarter from January 2001 to the present. If different from your answer to the preceding inquiry, separately state the number of subject tires that FTS subsequently sold to wholesalers, retail distributors or dealers, or to the general public through individual sales.

Response: FTS is unsure what the reference in the request to a preceding inquiry means. FTS notes that it did not import any tires subject to this information request until January, 2002. FTS annexes hereto a print out of its data base identifying the LTR tires it purchased from HZ and imported into the United States. The data base has this information sorted by quarter (invoice date), size and brand and the number of each such tire per invoice (bates stamped FTS 0002- 0115). FTS has redacted pricing information from this document. FTS also incorporates the information contained in its supplemental section 573 report containing the address of each FTS customer.

2. Separately, by each brand name and tire size of subject tire identified above, state the range of TINs of subject tires produced by HZR that FTS imported in each calendar quarter from January 2001 to the present.

Response: FTS is not in possession of this information. Upon information and belief, HZ would be in possession of this information.

3. Separately, for each subject tire imported by FTS, state the following:

- a. Tire identification number (TIN);
- b. Lot number associated with the subject tire;
- c. Date of manufacture; and
- d. Manufacturing plant.

Provide the information in a table in Microsoft Access 2000, or a compatible format, entitled "PRODUCTION DATA."

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Response: FTS is not in possession of this information. Upon information and belief, HZ would be in possession of this information.

4. As to all tires that you have identified in response to Request No. 1 above, please provide the following information:

a. Identify by contact name, address, and phone number each wholesale, retail distributor or dealer, and individual member of the general public to whom FTS directly sold or otherwise distributed any of the subject tires. Provide the number of tires sold or otherwise distributed to each, separately identified by brand name and tire size.

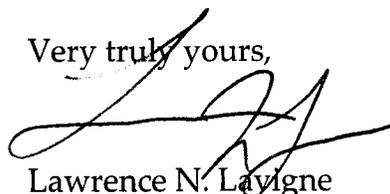
Response: FTS does not sell tires to the general public. Some of FTS customers are believed to sell LTR tires on the retail level however, the majority of FTS' customers are wholesalers. Attached hereto is a print-out of FTS' data base sorted by customer. Please note that the pages are not in numerical order as these are collated pages. Bates numbers FTS 0118-FTS 0287.

b. Produce a copy of each tire registration form (see 49 C.F.R. part 574) and comparable information (e.g., data bases and files with names of tire purchases (not for resale).

Response: FTS attaches copies of all product registration cards for HZ LTR tires it could locate (bates numbers FTS 0288-0341). Please note that documents bates stamped FTS 0039-0342 contain incorrect DOT numbers. FTS also includes a print-out of its data base for product registrations. This includes registrations made through the FTS web-site. Bates numbers FTS 0343-0347

Should you require any additional information regarding these responses, please do not hesitate to contact the undersigned.

Very truly yours,



Lawrence N. Lavigne
Norris McLaughlin & Marcus

* As noted in FTS' Amended section 573 report, Telluride is not a brand name.

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cc: John Savage, D.A.G.
New Jersey Attorney General's Office

Richard Kuskin