

UNIVERSAL TIRE

INTERNATIONAL

RECEIVED
NVS-210

August 3, 2007

Office of Chief Counsel
National Highway Traffic Safety Administration
Room W-41
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RECEIVED
2007 AUGUST 10 9:00A
DEFECTS INVESTIGATION
RECALL MGMT DIV.

Re: EQ07002

Dear Mr. Person:

Following is our response to questions 6 – 10, per your request dated July 2nd. As you are aware, we submitted our response to questions 1 – 5 earlier last month.

6. State, with respect to the tires identified in response to Request No. 1 above, by tire brand name, model, tire size and year of manufacture, the number of each of the following, received by your company, or of which your company is otherwise aware, which relate to, or may relate to tread separation, blowout or belt to belt separation in the similar tires that you imported:

- a. Reports involving a crash, injury, or fatality, based on claims against your company and/or HZR involving a death or injury, notices received by your company or HZR alleging or proving that a death or injury was caused by a possible defect in a subject vehicle;
- b. Property damage claims;
- c. Warranty adjustments;
- d. Complaints, including those from fleet operators;
- e. Third-party arbitration proceedings where your company is or was a defendant or codefendant.

For subparts “a” through “f,” state the total number of each item (e.g., fatality reports, property damage claims, warranty adjustments, etc.) separately. Multiple incidents involving the same tire are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a property damage claim and warranty adjustment involving the same incident in which a crash occurred are to be counted as a property damage claim and a warranty adjustment).

In addition, for items “a” through “f,” provide a summary description of the alleged problem and causal and contributing factors and your company’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

In response to number 6, the answer is “None” for “a” through “f”

7. Produce copies of all documents related to each item within the scope of your response to Request No. 6, including, but not limited to, received complaints and warranty adjustment claims. Describe the search method used by your company in identifying these documents. Organize the documents separately by category (i.e., fatality, property damage claims, warranty adjustments, etc.) and describe the method your company used for organizing the documents.

This is not applicable since we answered “None” to number 6.

8. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and/or that your company otherwise relied on in certifying that each of the subject tires were in compliance with the Federal Motor Vehicle Safety Standards. For each test, state the date of the test, describe the tire tested including model, size, and production date, describe the test (e.g., FMVSS No. 119 with “S” paragraph number” and state the test results. This information request covers a period prior to 2001 if the certification testing occurred before 2001/

Our company has not conducted any tests; we have relied on tests performed and certified by HZR.

9. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and/or about which your company otherwise had information on the subject tires, other than certification tests identified in your answer to Number 8 above. For each test, state the date of the test, describe the tire tested including model, size and production date, describe the test and state the test results. This information request covers a period prior to 2001 if for subject tires designed and tested before 2001.

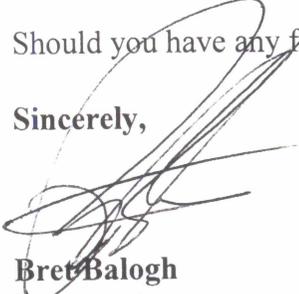
None

10. Provide copies of all communications with HZR related to durability and performance of the subject tires.

We do not have any such records.

Should you have any further questions, you may reach me at (305) 357-0348.

Sincerely,



**Bret Balogh
President
Universal Tire International**