

George F. Pierson
Chief
Recall Management Division
Office of Defects Investigation
Ric Willard
Consumer Safety Officer
National Highway Traffic Safety Administration
400 7th Street S.W.
Washington, D.C. 20590

Re: NVS-215rw
EQ07-002

Dear Mr. Pierson and Mr. Willard:

We are writing in response to your electronic mail message of July 6, 2007 and enclosed letter. In your letter you requested that Omni United (USA), Inc. ("Omni") respond to ten (10) numbered Requests. Pursuant to your instructions, we are responding here to numbered inquiries 6 through 10. We have previously responded to inquiries 1 through 5 on July 16, 2007 (the "Response"). As per your instructions, we have reproduced the text of your Requests below, followed by our response.

Request Number 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 party to the arbitration; and,
- f. Lawsuits, both pending and closed, in which 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.

Response:

a: None.

b: None.

c: There have been only two warranty adjustments relating to issues involving tread separation, blowout or belt to belt separation in "similar tires" (as that phrase is used in your Request out of 128,000 "similar tires" sold by Omni. We are in the process of gathering documents relating to those warranty adjustments, which we will forward shortly.

d: None.

e: None.

f: None

Request Number 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.

Response:

See Response to Request Number 6.

Request Number 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.

Response:

As explained in Omni's Response to Request No. 1, Omni has never imported "subject tires" as identified in your Request. With respect to "similar tires," Omni does not conduct or arrange to conduct independent testing. Omni has been informed that the manufacturer, Hangzhou Zhongce Rubber Co. Ltd. ("HZR"), is certified by the International Standards Organization ("ISO") and that the Light Truck Tires manufactured by HZR for Omni were tested by HZR for compliance with FMVSS 139.

Request Number 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.

Response:

See Response to Request No. 8.

Request Number 10:

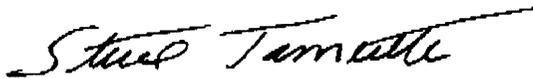
Provide copies of all communications with HZR related to durability and performance of the subject tires.

Response:

Omni has no written communications with HZR concerning durability and performance of "subject tires." As explained in Omni's Response to Request No. 2, shortly after learning of the recall of tires imported by FTS, Omni contacted HZR and requested that HZR provide it with confirmation that none of the tires sold to Omni contain any known safety related defects and that such tires all contained the appropriate "gumstrip" described above. Omni has received written confirmation of this from HZR dated June 28, 2007, a copy of which was previously provided as Exhibit 2.1 to Omni's July 16, 2007 Response.

Should you have any questions regarding any of the foregoing information or should you require any additional information or materials, please do not hesitate to contact me.

Sincerely

A handwritten signature in cursive script that reads "Steve Tamietti". The signature is written in black ink and is positioned above the printed name.

Steve Tamietti

Omni-United