

RECEIVED
2007 JULY 18 1:35P
DEFECTS INVESTIGATION
RECALL MGMT DIV.

ORTECK INTERNATIONAL

7917 Cessna Ave
Gaithersburg, MD. 20879
240-683-4640

07/18/2007

George H. Pearson
Recall Management Division
Office of Defects Investigation
EQ07-002

Dear Mr. George Pearson

Orteck has had time to read and evaluate the most recent documents supplied by the HZ lawyers and the press release by FTS. After careful examination of the most recent data Orteck firmly believes the tires purchased from HZ are not affected by the recall and do not pose any potential defects that would be deemed unsafe to the public. We are listing below the items and reasons as to how we came to this determination. For the reasons listed, Orteck believes there is no evidence that would require us to recall the tires purchased from HZ and therefore should not be included in the recall. Please advise us of your determination of our request.

1. In reference to the letter supplied by Hogan & Hartson (lawyers for HZ) page 2 & 3 **Basic Overview of Design History of Subject Tires.** All tires Orteck purchased from HZ fall into Phase III Design which began on 0306, as you can see by our formal response, the earliest tires Orteck purchased had a DOT of 2306. Phase III Design also required HZ to meet or exceed the new high-speed performance requirements of federal standard FMVSS-139.
2. In reference to latest FTS press release FTS clearly states that the only tires affected by the recall will be designated LT and the only DOT codes affected will end in "02", "03", "04" or "05" and LT tires with DOT numbers ending in "06" are not part of the recall.
3. Furthermore Orteck has no evidence, suspicion, concern or belief that the tires purchased from HZ did not meet specifications set forth in FMVSS-139.

If I can be of any additional assistance please feel free to contact me Monday thru Friday between 8:00am and 5:00pm at the number listed below. If I am not in the office please ask for Vernon Kuehn.

Sincerely

Sonny Veen

Sonny Veen
Vice President
240-683-4640