

# Cambridge Trading Ltd.

4299 Industrial Drive  
Jackson, MS 39209  
Tel: (601) 974-5940  
Fax: (601) 974-5974

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July 10, 2007

George H. Person, Chief  
Recall Management Division  
Office of Defects Investigation

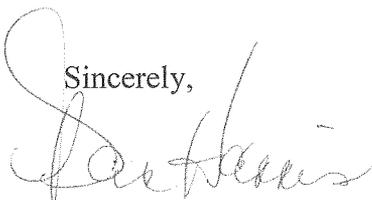
Dear Mr. Person,

In regards to the notice we have received showing Cambridge Trading Ltd to be an importer of the tires from Hangzhou Zhongee Rubber Co. Ltd. Attached is bill of lading for container CLHU8140680, the entry / immediate delivery from Homeland Security and the commercial invoice for that same container.

These tires on this commercial invoice are not the same size or type that is on the recall, these are for large trucks.

Please let me know if you have any other questions or need any more information.

Sincerely,



Pam Harris  
Cambridge Trading Ltd.

U.S. DEPARTMENT OF HOMELAND SECURITY  
Bureau of Customs and Border Protection

ENTRY/IMMEDIATE DELIVERY

CST# 739

ALBA WHEELS UP INTERNATIONAL INC  
11222 La Cienega Blvd  
suite 678  
Inglewood, CA 90304  
PH: 310-410-8030  
FAX: 310-410-8040

ENTRY DOCUMENTS REQUIRED

ABI Certified

19 CFR 142.3, 142.16, 142.22, 142.24

Broker Code: 820

1. ARRIVAL DATE <b>111906</b>		2. ELECTED ENTRY DATE		3. ENTRY TYPE CODE/NAME <b>01 Consumption</b>		4. ENTRY NUMBER <b>820-0821477-5</b>	
5. PORT <b>2704</b>		6. SINGLE TRANS. BOND		7. BROKER/IMPORTER FILE NUMBER <b>821477 JT 5001</b>			
		8. CONSIGNEE NUMBER <b>64-074752200</b>				9. IMPORTER NUMBER <b>Same</b>	
10. ULTIMATE CONSIGNEE NAME <b>CAMBRIDGE TRADING LTD 4299 INDUSTRIAL DRIVE JACKSON, MS 38606</b>				11. IMPORTER OF RECORD NAME <b>Same</b>			
12. CARRIER CODE <b>MSCU</b>		13. VOYAGE/FLIGHT/TRIP <b>0644A</b>		14. LOCATION OF GOODS CODE(S)/NAME(S) <b>Z978 SSA TERM. - ZIM/MSC LINES</b>			
15. VESSEL CODE/NAME <b>MSC LORETTA</b>							
16. U.S. PORT OF UNLADING <b>2704</b>		17. MANIFEST NUMBER		18. G.O. NUMBER		19. TOTAL VALUE <b>35598</b>	
20. DESCRIPTION OF MERCHANDISE <b>LIGHT TRUCK RADIAL TIRES</b>							
21. IT/BL/AWB CODE <b>M57035</b>		22. IT/BL/AWB NO. <b>MSCUAG192360</b>		23. MANIFEST QUANTITY <b>265</b>		24. H.S. NUMBER <b>4011.20.1005</b>	
						25. COUNTRY OF ORIGIN <b>CN</b>	
						26. MANUFACTURER NO. <b>CN HANZHDIHAN</b>	

27. CERTIFICATION

28. CBP USE ONLY

I hereby make application for entry/immediate delivery. I certify that the above information is accurate, the bond is sufficient, valid, and current, and that all requirements of 19 CFR Part 142 have been met.

OTHER AGENCY ACTION REQUIRED, NAMELY:

SIGNATURE OF APPLICANT

**Attorney-In-Fact**

**X JEFF TOOLEY**

PHONE NO.

**310-410-8030**

DATE

**11/17/06**

CBP EXAMINATION REQUIRED

ENTRY REJECTED, BECAUSE:

29. BROKER OR OTHER GOVT. AGENCY USE

Exam Site: **W344 PRICE TRANSFER (C)**  
Container #: **CLHU8140680**      **265**

DELIVERY AUTHORIZED:

SIGNATURE

DATE

PAPERWORK REDUCTION ACT NOTICE: This information is to determine the admissibility of imports into the United States and to provide the necessary information for the examination of the cargo and to establish the liability for payment of duties and taxes. Your response is necessary. The estimated average burden associated with this collection of information is 15 minutes per respondent depending on individual circumstances. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to Bureau of Customs and Border Protection, Information Services Branch, Washington, DC 20229, and to the Office of Management and Budget, Paperwork Reduction Project (1651-0024), Washington, DC 20503.

**KS HOLDING LIMITED**

UNIT D 10/F CHINA OVERSEAS BLDG, 139 HENNESSY ROAD, WANCHAI, HONGKONG  
TEL:852-28763836 FAX:852-25273298

**COMMERCIAL INVOICE**

To: CAMBRIDGE TRADING,LTD.,  
4299 INDUSTRIAL DRIVE  
JACKSON,MS 38606

Date: Nov.06, 2006  
Invoice No.: 6980/HZ/PL/MTKSY  
Order No.: PAF-H-10-06  
CPO No.: ALI-10-26-06

From: SHANGHAI,CHINA

To: HOUSTON,TX

Shipped: BY SEA

Description of goods	Quantity	Unit price	Amount
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CHINESE NEW TIRES  
COUNTRY OF ORIGIN: CHINA  
CC NO.:523 ST NO.:523  
DOT NO.:7D

CODE NO:

3087	285/75R24.5 14 VT600	VESTA	74 PCS	142.89	10,573.86
[ 3095	11R22.5 14 CR989	VESTA	16 ]	126.75	2,028.00
3095	11R22.5 14 CR989	GOODRIDE	47 ] 63	126.75	5,957.25
3097	11R24.5 14 CR989	GOODRIDE	6	134.26	805.56
[ 3076	295/75R22.5 14 CR989	VESTA	5 ]	125.25	626.25
3076	295/75R22.5 14 CR989	GOODRIDE	22 ] 27	125.25	2,755.50
3078	285/75R24.5 14 CR989	VESTA	95	135.28	12,851.60
TOTAL :			265 PCS		35,598.02

TOTAL AMOUNT USD 35,598.02

FOB SHANGHAI,CHINA

NET WEIGHT: 14,352.00 KGS  
GROSS WEIGHT: 14,352.00 KGS  
MEASUREMENT: 56.000 CBM

CONTAINER NO.: CLHU8140680  
BL NO.: CLTSN06472  
BL DATE:Nov.06,2006

  
Pc # PAF-H-10-06

You are kindly requested to arrange wire transfer per following bank details.

DBS Bank Ltd Shanghai Branch  
Acct Name: KS Holding Limited  
Acct No: 4480000967  
SWIFT No: DBSSCNSH

SHIPPER / EXPORTER (2) (COMPLETE NAME AND ADDRESS) <b>KS HOLDING LIMITED UNIT D 10/F CHINA OVERSEAS BLDG, 139 HENNESSY ROAD, WANCHAI HONGKONG</b>		BOOKING NUMBER	FMC BOND NO. (IF APPLICABLE) OTI LIC. NO. (IF APPLICABLE)
CONSIGNEE (3) (COMPLETE NAME AND ADDRESS) <b>CAMBRIDGE TRADING LTD. 4299 INDUSTRIAL DRIVE JACKSON, MS 38606</b>		EXPORT REFERENCES <b>OI0611SHA78949LGB</b>	FORWARDING AGENT (Reference) <b>CARGO LINK INTERNATIONAL INC. TIANJIN TIANJIN JUNYUE HOTEL 888 ROOM, 160 GUYUE ROAD, ROAD, HEPING DISTRICT TIANJIN, 300061 TEL: 0086-22-23086016 / 17 / 18 / 19 FAX: 0086-22-23086017</b>
NOTIFY PARTY (4) (COMPLETE NAME AND ADDRESS) <b>(1) PACIFIC ASSET FUNDING, LLC 700 NEWPORT CENTER DRIVE NEWPORT BEACH, CA 92660-6397 (2) ORTECK INTERNATIONAL INC. 7917 G-H CESSNA AVE GAITHERSBURG, MD 20879 USA TEL: 240-683-4640 FAX: 240-683-4644</b>		POINT AND COUNTRY OF ORIGIN	ROUTING INSTRUCTIONS <b>Dynalink Systems Inc. 11222 LA CIENEGA BLVD. SUITE#588 INGLEWOOD, CA 90304 TEL: 310-216-6881 FAX: 310-491-1256</b>
PRE-CARRIAGE BY	PLACE OF RECEIPT	OCEAN VESSEL/VOY NO. <b>MSC LORETTA V.0644A</b>	PORT OF LOADING <b>SHANGHAI, CHINA</b>
PORT OF DISCHARGE <b>LONG BEACH, CA</b>	PLACE OF DELIVERY <b>HOUSTON, TX 77041</b>	LOADING PIER	TYPE OF MOVE <b>CY/Door</b>
		CENTRAL BUILT YES NO	

MARKS AND NUMBERS	NO. OF PKGS	DESCRIPTION OF PACKAGES AND GOODS PARTICULARS FURNISHED BY SHIPPER	GROSS WEIGHT	MEASUREMENT
N/M	265 Pieces	CTN#CLHU8140680 SN:3744791 40 FT HQ CHINESE NEW TIRES COUNTRY OF ORIGIN: CHINA NO WOOD PACKING MATERIAL IS USED IN THIS SHIPMENT ORDER NO: PAF-H-10-06 CPO NO: ALI-10-26-06 CC NO: 523 ST NO: 523 DOT NO: 7D SIZE/PR: 285/75R24.5 14 VT600 QTY 74 PCS 11R22.5 14 CR989 16 11R22.5 14 CR989 47 11R24.5 14 CR989 6 295/75R22.5 14 CR989 5 295/75R22.5 14 CR989 22 285/75R24.5 14 CR989 95  <b>TOTAL: 265 SAY TWO HUNDRED AND SIXTY FIVE PCS ONLY. AMS#: MSCUAG192360</b>	14352 Kgs	

PER EXCESS AD VALOREM VALUE SEE CLAUSE ON REVERSE SIDE CHARGES INCLUDING FREIGHT

FREIGHT RATES, CHARGES, WEIGHTS AND/OR MEASUREMENTS		RECEIVED FOR SHIPMENT from the MERCHANT in duplicate by you and a duplicate copy to be retained by the carrier. The GOOD mentioned above have been loaded on board and held in custody of the carrier. The carrier is not responsible for the goods or any part of the part of the cargo, SUBJECT TO ALL THE TERMS AND CONDITIONS appearing on the back and back notes and in the CARRIER'S applicable tariff, to which it is referred to by the bill of lading.	
SUBJECT TO CORRECTION	PREPAID	COLLECT	While applicable rate applies and not otherwise, one copy of the BILL OF LADING shall be issued to the shipper and one copy to the carrier. The carrier shall be responsible for the goods or any part of the cargo, SUBJECT TO ALL THE TERMS AND CONDITIONS appearing on the back and back notes and in the CARRIER'S applicable tariff, to which it is referred to by the bill of lading.
<b>FREIGHT COLLECT (ALL IN COLLECT)</b>			DATED AT <b>SHANGHAI</b>
TOTAL PREPAID			By <b>AS AGENT FOR THE CARRIER MSC</b>
TOTAL COLLECT			B/L NO. MO. DAY. YEAR <b>CLTSN06472 November 6, 2006</b>



U.S. Department  
of Transportation  
**National Highway  
Traffic Safety  
Administration**

1200 New Jersey Avenue SE  
Washington, DC 20590

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

JUL 2 2007

Cambridge Trading LTD  
4299 Industrial Drive  
Jackson, MS 39209-2748

NVS-215rw  
EQ07-002

Dear Sir or Madam:

As you may be aware, Foreign Tire Sales, Inc (FTS), an importer of tires, has decided that a defect may exist in certain light truck radial tires manufactured by Hangzhou Zhongce Rubber Co. Ltd (HZR) in Hangzhou, China under the brand names Westlake, Telluride, Compass and YKS. FTS alleges that HZR discontinued the use of, and later reincorporated less effective, belt edge strips (gum strips) in the construction of these tires without FTS's approval or knowledge. According to FTS, such construction is susceptible to tread separation, which can result in a vehicle crash, property damage, injury or death. FTS has reported two (2) fatalities and one (1) serious injury resulting from an incident involving tread separation. These tires have been identified by size by FTS as follows:

- 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
- LT31X10.5-15 CR857 CR861

These tires may be referred hereinafter as "subject tires."

Cambridge Trading LTD has been identified as an entity who may have imported tires of similar construction as those listed above that were fabricated in China by HZR. A copy of the report filed by FTS in this matter is enclosed for your information.

1. Please identify by brand, model name and size all light truck radial tires produced by HZR that are the same size as any of the tires identified on page 1 of this letter, and which were imported into the United States by your company between January 2001 to present, that your company sold or otherwise distributed in the United States. These tires are referred hereinafter as "similar tires."

**Answer: NONE**

2. If your company does not agree with the statement made in the enclosed report by FTS that your company imported tires manufactured by HZR that are similarly constructed and of the same size as those identified by FTS, and if your company does not believe that those similar tires contain a safety-related defect, please provide an explanation for your company's position.

**Answer: ENCLOSED**

3. Separately, for each tire line identified as similar tires above, state quantity of, and the range of TINs, for those tires that your company sold to wholesalers, retail distributors or dealers, or to the general public through individual sales.

**Answer: NONE**

4. As to all similar 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 wholesaler, retail distributor or dealer, and individual member of the general public to whom your company directly sold or otherwise distributed any of the similar tires. Provide the number of tires sold or otherwise distributed to each, separately identified by brand name and size.

**Answer: NONE**

- b. Provide 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 purchasers (not for resale)).

**Answer: NONE**

5. State whether or not your company imported and sold tires bearing the manufacturing code "FTS" in the TIN.

**Answer: NO**

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 you company is or was a defendant or codefendant.

**Answer: NONE**

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 compliant or other document initiating the action was filed.

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.

**Answer: N/A**

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.

**Answer: N/A**

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.

**Answer: N/A**

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

**Answer: N/A**