

**The Goodyear Tire & Rubber Company**  
**Akron, Ohio 44316 - 0001**

July 9, 2007

George Person, Chief  
Recall Management Division  
Office of Defects Investigation  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590

**Subject: Response to Request for Information on Hangzhou Manufactured Tires**

**Reference: EQ07-002**

Dear George,

We received the request for information you sent regarding tires produced by HZR. Before addressing the specific questions per your request, I thought the following key points would be useful in both articulating our own perspective on this matter, as well as to assist in your understanding of it.

The comments below relate to the tires Goodyear sources from Hangzhou:

- These tires are, and have been since we began to source them in September 2006, manufactured in a different, newly constructed factory, not the factory that produced the FTS tires in question.
- These tires are made to Goodyear's quality standards.
- These tires are of a different construction than those sourced by FTS, ie, tires sourced by Goodyear contain gum strips as verified by our own regular testing procedures and cut tire analysis.
- These tires sourced by Goodyear met the FMVSS 139 testing standard, as well as our own internal standards, from the inception of the sourcing of these tires in September 2006.
- Subsequent to the initial recall notice submitted by FTS, we also cut Hangzhou sourced tires in our inventory, confirming the existence of gum strips.

Our numbered responses to your specific requests follow:

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 the present, that your company sold or otherwise distributed in the United States. These tires are referred hereinafter as "similar tires."

RESPONSE: See attached list. Please note that we do not import any of the brands listed in the first paragraph of your request.

(CONFIDENTIAL)

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.

RESPONSE:

(CONFIDENTIAL)

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.

RESPONSE:

(CONFIDENTIAL)

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.

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).

RESPONSE:

(CONFIDENTIAL)

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

RESPONSE: We did not import or sell any tires bearing the manufacturing code "FTS" in the TIN.

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;

RESPONSE: None.

b. Property damage claims;

RESPONSE: None.

c. Warranty adjustments;

RESPONSE: None.

d. Complaints, including those from fleet operators;

RESPONSE: None.

e. Third-party arbitration proceedings where your company is or was a party to the arbitration; and

RESPONSE: None.

f. Lawsuits, both pending and closed, in which your company is or was a defendant or codefendant.

RESPONSE: None.

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: None.

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: This response is not due until July 30, 2007.

9. Describe all testing that your company conducted, arranged to have conducted (e.g., by a test laboratory) and/or that 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: This response is not due until July 30, 2007.

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

RESPONSE: None.

Sincerely,

A handwritten signature in black ink that reads "Simeon S. Ford". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Simeon S. Ford  
Manager, Global Regulations, Standards & Compliance  
The Goodyear Tire & Rubber Company