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July 30, 2007

Mr. George H. Person, Chief
Recall Management Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: EQ07-002
NVS-215rw

Dear Mr. Person:

This letter completes the response to your letter of July 2, 2007 regarding certain tires manufactured by Hangzhou Zhongce Rubber Co. Ltd. and imported into the United States by Tireco Inc. This letter responds to questions seven through ten, and supplements the responses to some of the earlier responses.

On behalf of Tireco Inc., I am pleased to have this opportunity to cooperate with your inquiry. As I noted in my previous letter, my colleagues and I are willing to meet with the agency to discuss this response or any other information that would help the agency resolve the open issues related to tires imported by Tireco Inc.

Sincerely,

A handwritten signature in black ink, appearing to be "Tom Mills", written over the word "Sincerely,".

Tom Mills
General Counsel

Enclosure

TIRECO INC.'S SECOND RESPONSE TO NHTSA INQUIRY EQ07-002

This document completes the response of Tireco Inc. ("Tireco") to NHTSA's Information Request of July 2, 2007, seeking information regarding certain tires manufactured by Hangzhou Zhongce Rubber Co., Ltd. ("HZR") and imported into the United States by Tireco.

Tireco responded to Questions 1-6, and partially responded to Question 7 on July 11, 2007. This letter completes the response to Question 7, responds to Questions 8-10, and supplements certain responses with information that was not available on July 11, 2007. Tireco incorporates by reference in this response its July 11, 2007 response, including specifically its description of the scope and limitations of its search for responsive information.

As requested, after each numeric designation, Tireco has set forth verbatim the request for information, followed by its response. Tireco has undertaken to provide responsive documents dated up to and including July 2, 2007, the date of your inquiry, except that the test reports provided in response to Question 9 were completed after that date, as was some of the material provided in response to Question 10.

- 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,¹ 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."*

This question was answered on July 11, 2007. Since filing that response, Tireco has identified five additional Westlake brand tires known as model H280 that are of the same sizes as those identified in the NHTSA information request. These were inadvertently omitted from the July 11 response. These are identified in the following table:

Brand	Model	Size
WESTLAKE	H280	LT235/75R15
WESTLAKE	H280	LT235/85R16
WESTLAKE	H280	LT245/75R16
WESTLAKE	H280	LT265/75R16
WESTLAKE	H280	31x10.5R15LT

¹ These tires, called "subject tires" in NHTSA's information request, are:

- LT235/75R-15
- LT225/75R-16
- LT235/85R-16
- LT245/75R-16
- LT265/75R-16
- LT31X10.5-15

Tireco notes that Foreign Tire Sales (FTS) has reported to NHTSA on more than one occasion its belief that Tireco has imported some of the HZR tires that are subject to the recall before December 2005. FTS repeated this statement to NHTSA in a telephone call with George Person of NHTSA on July 17, 2007, according to a summary of the telephone call that is posted in the NHTSA Recall file for Recall 07T003. Tireco reiterates, as it said in the July 11 response, that it did not import any light truck radial tires manufactured by HZR before June 2006, and none of the HZR light truck radial tires imported by Tireco were manufactured before the 21st week of 2006.

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.*

This question was answered on July 11, 2007. With respect to the five tire sizes of model H280 identified above, Tireco does not believe that these tires contain a safety defect. HZR has informed Tireco that all of the H280 model tires contained a nylon edge cap and passed FMVSS No. 139 tests.

The field performance of the H280 confirms Tireco's conclusion that they do not contain a safety related defect. Tireco has imported and sold [REDACTED] Model H280 tires, and has received [REDACTED] tires back, all from a single customer. Including the Model H280 tires, therefore, Tireco has sold a total of approximately [REDACTED] HZR-manufactured tires of the sizes in question, and only [REDACTED] such tires have been returned to Tireco for any reason. Hence, the overall return rate is 0.018 percent, and the overall tread separation rate is 0.00081 percent.

As was the case with the tires covered by the July 11, 2007 report, Tireco has received no reports of accidents, lawsuits or property damage claims related to the H280 model tires.

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.*

This question was answered in part on July 11, 2007. With respect to the model H280 tires, the requested information follows:

Size	Number Sold	TIN Manufacturer and Size Identification	TIN Date Code Range
LT235/75R15	[REDACTED]	7DMT	2106-2506
LT235/85R16	[REDACTED]	7DMR	2106-3306
LT245/75R16	[REDACTED]	7DNT	2106-3206
LT265/75R16	[REDACTED]	7DRT	2106-3306
31x10.5R15LT	[REDACTED]	7DRR	2106-2506

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.*

This question was answered on July 11, 2007. With respect to the Model H280 tires, the requested information is attached at Confidential Exhibit D. (Note: Exhibits A, B, and C were provided on July 11, 2007. To minimize any possible confusion, Tireco is identifying the Exhibits provided with this submission beginning with Exhibit D.)

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 name of tire purchasers (not for resale)).*

Pursuant to 49 C.F.R. 574.7, Tireco is using a designee to retain the tire registration forms for its tires. Tireco has requested its designee to provide the applicable forms. Unfortunately, Tireco has not yet received them from its designee. Tireco will provide copies of the forms under separate cover promptly after they are received.

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

This question was answered on July 11, 2007, and the answer is not changed by the inclusion of the H280 model tires.

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.

- a. *Crash, death, injury, or fatality.*
- b. *Property damage claims.*
- c. *Warranty adjustments.*
- d. *Complaints.*
- e. *Arbitration proceedings.*
- f. *Lawsuits.*

This question was answered on July 11, 2007. With respect to the Model H280 tires identified in today's response, the answer is "none" with respect to all but item 6.c, warranty adjustments. Information responsive to warranty adjustments involving the H280 tires is attached as Confidential Exhibit E.

- 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.*

Copies of documents that relate to the warranty adjustment information provided both on July 11, 2007 and today in response to Item 6.c are attached at Confidential Exhibit F. Pursuant to a discussion between Tireco's outside counsel, Erika Jones, and George Person of NHTSA,

Tireco is including all of Tireco's internal records related to the processing of warranty adjustments of the tires identified in its response to Question 6, including specifically all records related to Tireco's inspection of those adjusted tires. Tireco is not including documents that reflect only the financial credits provided back to the tire dealers for adjusted tires.

As Tireco noted on July 11, in its earlier response to Question 6, Tireco included information about its adjustments of tires with the letters "FTS" in the TIN, which it did not distribute, but which had incorrectly been returned to Tireco. Documents related to adjustments involving those non-Tireco tires are also included in the response to Question 7.

Tireco described its search method and document organization method in its July 11, 2007 response.

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.*

Tireco did not itself certify that the imported tires are in compliance with the Federal Motor Vehicle Safety Standards, and therefore it did not rely on any testing in that regard. The tires were certified as compliant by the tire manufacturer, HZR. Tireco is informed that HZR will be providing NHTSA with records documenting the testing it did to support its certification to FMVSS No. 139 of the tires imported by Tireco.

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 answers 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.*

As noted in Tireco's July 11, 2007 response, Tireco commissioned independent testing of HZR-manufactured tires imported by Tireco at Standard Testing Labs (STL). STL's test reports are attached at Exhibit G. (STL has advised Tireco that Test numbers TRC7-0018 and TRCT7-0019 were initially assigned to tires that were duplicates of the tires numbered TRCT7-0017 and TRCT7-0020, respectively. After STL decided to test no more than two of each size tire, tires numbered TRC7-0018 and TRCT7-0019 were not tested.)

As stated in STL's "Report Summary," STL tested eleven tires. They were first shearographed as received to look for pre-existing anomalies. They were then run on roadwheel dynamometers pursuant to the procedures specified in the "Endurance" section of FMVSS No. 139, for a total of 36 hours or 2662.5 miles, after which they were again shearographed for comparison purposes. The tires were then put back on the roadwheel dynamometers and run to

failure per an extended, more severe version of FMVSS 139 under which the load is increased every four hours by approximately 10% of the maximum rated single load capacity of the tire. Each tire was examined after failure and the failure type noted. STL then performed a cut-section examination of each tire for the purpose of viewing and evaluating the tire's construction and design, especially in the tread/belt area.

The test results indicated the following :

1. Although pre-test shearography revealed that five of the eleven tires had small pretest anomalies in both the tread and sidewall areas, none of these anomalies were considered significant. None of the other six had such anomalies.
 2. All eleven tires passed the 36 hour FMVSS No. 139 Endurance requirements.
 3. Post-test shearography revealed that the six tires that originally had no anomalies still had none and that the original anomalies in the other five tires did not increase in size. Some new anomalies were found in the tread and sidewall areas of those tires that correspond to the failed areas, but none of these anomalies would be apparent, either visibly or tactilely.
 4. The cut-section analysis revealed that the internal component placement and construction, particularly in the tread/belt area, are in line with tire industry practice. The analysis noted one exception in one tire, which had no belt edge gum strip under the number one belt edge, on the DOT serial number side. However, this tire had no anomalies identified by shearography, and the omission did not have a noticeable effect on the tire's performance.
10. *Provide copies of all communications with HZR related to durability and performance of the subject tires.*

All responsive documents are attached at Exhibit H. However, it should be noted that the documents provided to Tireco by HZR contain reports of tests of HZR tire models that were not imported by Tireco.

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Thank you for this opportunity to cooperate with your inquiry. As noted in the July 11, 2007 response, Tireco representatives are willing to meet with the agency to discuss this response or any other information that would help the agency resolve any issues related to tires imported by Tireco.

Exhibit D

Redacted

Exhibit E

Redacted

Exhibit F

Redacted



STL

TRANS TECH

Transportation
Technologies

Investigative Services

July 27, 2007

Sent via email
tomm@tireco.com

Mr. Tom Mills
Tireco, Inc.
300 W. Artesia Blvd.
Compton CA 90220

RE: TIRE TESTING RESULTS

Dear Mr. Mills:

Attached is my summary report and supporting data sheets for the 11 light truck tires of various sizes that you sent in for testing. All tires passed FMVSS 139 Endurance and met normal structural design standards.

Hard copies of this information will follow. Please let me know if you have any questions.

Sincerely,

Tim Flood
Chief Engineer, Technical Services

TF:dlk
Attach.

cc: Erika Jones
EJones@mayerbrownrowe.com



STL

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TIRECO TESTING

REPORT SUMMARY

STL FILE NO. TT07-2961

Testing and construction analyses were conducted on eleven light truck tires of various sizes manufactured by Hangzhou General Rubber Factory, Hangzhou, the P.R. of China. These tires are:

STL Test No.	Size	L. R.	Brand	DOT
TRCT7-0011	LT235/75R15	C	Westlake	7DMT1CL0507
TRCT7-0012	LT235/75R15	C	Westlake	7DMT1CL0107
TRCT7-0013	31x10.50R15LT	C	Westlake	7DRR1CL0407
TRCT7-0014	31x10.50R15LT	C	Westlake	7DRR1CL5006
TRCT7-0015	LT225/75R16	E	Westlake	7DLT2CL0307
TRCT7-0016	LT245/75R16	E	Milestar CR857	7DNT2CL3806
TRCT7-0017	LT245/75R16	E	Westlake	7DNT2CL1407
TRCT7-0020	LT235/85R16	E	Westlake	7DMR2CL0607
TRCT7-0021	LT235/85R16	E	Milestar CR857	7DMR2CL4906
TRCT7-0022	LT265/75R16	E	Westlake	7DRT2CL4206
TRCT7-0023	LT265/75R16	E	Milestar Tell. A/T	7DRT2CL0507

Note: Tires will be referred to by their respective STL Test No. for the remainder of the report. Test No. TRCT7-0011 represents the first tire tested for this program. Tires TRCT7-0018 and TRCT7-0019 were intentionally omitted, as these are duplicates of other tires tested.

Procedure

The eleven tires were first shearographed as received to look for pre-existing anomalies, i.e. small separations, in the tread and sidewall areas. Shearography is a non-destructive method for examining the internal structure of a tire by photographing the innerliner illuminated by a laser

light source. Two 360° photos are taken of the innerliner, one at normal atmospheric pressure and the second photo in a vacuum. The vacuum environment allows micro expansion of any separations which appear as bumps and/or ridges on the liner as viewed by laser light.

The tires were then run on roadwheel dynamometers per FMVSS 139 Endurance for a total of 36 hours or 2662.5 miles. Test load and inflation conditions are adjusted periodically as the test progresses.

The tires were again shearographed at the conclusion of the required 36 hour FMVSS Endurance and compared to the original shearographs for any changes.

All eleven tires were put back on the roadwheel dynamometers, after the post test shearographs, and run to failure per an extended version of FMVSS 139. The load is increased every four hours by approximately 10% of the maximum rated single load capacity of the tire. The four hour load increases continue until the tire fails. This method is considered extremely abusive to any tire.

Failure criteria range from tread chunking to more catastrophic failure modes. This methodology is an STL recommended practice used by many tire companies. Each tire was examined after failure and the failure type noted.

The last step was cut-section examination of each tire. A section was cut out of each tire, from bead to bead, for the purpose of viewing and evaluating the tire's construction and design, especially in the tread/belt area. The belts and related components were measured and their location relative to each other was noted.

Results

Five of the eleven tires had small pretest anomalies in both the tread and sidewall areas per shearography. These were test numbers: TRCT7-0015, TRCT7-0016, TRCT7-0017, TRCT7-20 and TRCT7-23. None of these anomalies is considered significant and the other six tires had no anomalies.

All eleven tires passed the 36 hour FMVSS 139 Endurance.

After successfully completing the 139 Endurance, the post test shearographs at 36 hours revealed that the six tires originally having no anomalies still had none. The original anomalies in the other five tires did not increase in size. Rather, new anomalies were found in the tread and sidewall areas of the tires listed above. Tires TRCT7-0020, TRCT7-0021, TRCT7-0022 and TRCT7-0023 each contained some anomalies that correspond to the failed areas. None of these anomalies would be apparent, either visibly or tactily.

Each tire was inspected after failing during the extended portion of FMVSS139. The types of failures described below are typical results from a tire tested to significant levels of abuse.

<u>STL Test No.</u>	<u>Total Test Hrs</u>	<u>Failure Description</u>
TRCT7-0011	48.6	Belt edge sep. SS crown, with detached sh. rib, 9" long at 4:15
TRCT7-0012	56.6	Tread off nylon edge strip & belt edge sep. 5 ½" long, 3:30 on non-serial side
TRCT7-0013	60.3	Lower SW blowout, NSS with radial splits. Intermittent cracking lower SW, NSS
TRCT7-0014	65.0	170° carcass break above rim centering ring, NSS 3 ½" sh. rib chunk-out 3:30, NSS
TRCT7-0015	48.6	Tread & top belt detachment as a unit, 0° to 360°
TRCT7-0016	48.0	Sh. element chunk-out, SS lower SW sep. serial and non-serial side
TRCT7-0017	44.1	Sh. rib detachment off nylon edge strip, NSS 7:00-9:30, with partial belt edge sep. in this area
TRCT7-0020	52.4	Flex break 360° below rim centering ring, NSS lower SW sep. 3" long SS
TRCT7-0021	45.2	Tread/belt detachment between #1 & #2 steel belts, 17" long centered at 12:00. Detachment extends into both sh. buttresses
TRCT7-0022	44.3	190° carcass break at rim centering ring, NSS 360° lower SW sep.
TRCT7-0023	47.9	Developing, SS tread bulge on SS tread crown 5:45, indicating separation

Cut Section Analysis

The internal component placement and construction, particularly in the tread/belt area, are in line with tire industry practice. One exception was tire TRT7-0011 which had no belt edge gum strip under the number one belt edge, on the DOT serial number side. This omission did not have a noticeable effect on the tires' performance.

Note

Test sheets, cut-section analysis and comparison spread sheet are attached.

**TIRECO DATA SHEET
TT07-2961**

Page 1 of 2

Test No.	Date Rec'd.	Tire Size	L	Serial No.	Load Index	Speed Rating	Type Test	PSI	Load	Tire Const.	Tire Name
TRCT7-0011	07/10/07	LT235/75R15	C	7DMT 1CL 0507	104/101	Q	139 End Ext.	50/50	1985/1820	2P2S1N 2P	Telluride A/T CR861
TRCT7-0012	07/10/07	LT235/75R15	C	7DMT 1CL 0107	104/101	Q	139 Ext.	50/50	1985/1820	2P2S1N 2P	Telluride A/T CR857
TRCT7-0013	07/10/07	31x10.50R 15LT	C	7DRR 1CL 0407	109	Q	139 Ext.	50	2270	2P2S1N 2P	Telluride M/S CR857
TRCT7-0014	07/10/07	31x10.50R 15LT	C	7DRR 1CL 5006	109	Q	139 Ext.	50	2270	2P2S1N 2P	Telluride A/T CR861
TRCT7-0015	07/10/07	LT225/75R16	E	7DLT 2CL 0307	115/112	Q	139 Ext.	80/80	2680/2470	2P2S1N 2P	Telluride A/T CR861
TRCT7-0016	07/10/07	LT245/75R16	E	7DNT 2CL 3806	120/116	L	139 Ext.	80/80	3042/2778	2P2S1N 2P	Milestar CR857
TRCT7-0017	07/10/07	LT245/75R16	E	7DNT 2CL 1407	120/116	Q	139 Ext.	80/80	3042/2778	2P2S1N 2P	Telluride A/T CR861
TRCT7-0020	07/10/07	LT235/85R16	E	7DMR 2CL 0607	120/116	Q	139 Ext.	80/80	3042/2778	2P2S1N 2P	Telluride A/P CR860
TRCT7-0021	07/10/07	LT235/85R16	E	7DMR 2CL 4906	120/116	L	139 Ext.	80/80	3042/2778	2P2S1N 2P	Milestar CR857
TRCT7-0022	07/10/07	LT265/75R16	E	7DRT 2CL 4206	123/120	Q	139 Ext.	80/80	3415/3085	2P2S1N 2P	Telluride A/P CR860
TRCT7-0023	07/10/07	LT265/75R16	E	7DRT 2CL 0507	123/120	Q	139 Ext.	80/80	3415/3085	2P2S1N 2P	Milestar Telluride A/T

TIRECO DATA SHEET
TT07-2961

Page 2 of 2

Test No.	Duration to Fail - Hrs.	Pre-Test Shearography Results	FMVSS139 Shearography Results at 36 Hrs.
TRCT7-0011	48.6	OK	OK
TRCT7-0012	56.6	OK	OK
TRCT7-0013	60.3	OK	OK
TRCT7-0014	65.0	OK	OK
TRCT7-0015	48.6	Small crown anomaly 245° NSS	No change
TRCT7-0016	48.0	? area crown 105° SS	No change at 105°. New anomalies @ 170° SS crown; 245° SS crown; 250° NSS crown
TRCT7-0017	44.1	Small crown anomaly 205° SS	No change at 205°, minor anomalies 280° - 320° NSS
TRCT7-0020	52.4	Small crown anomaly 250° NSS	No change at 250°, small anomalies, lower SW, SS at 80°, 85°, 145°, 150°, 270°, 280°, 295°, 310°, 320°
TRCT7-0021	45.2	OK	Intermittent anomalies 0° - 360°, SS crown. Small anomalies NSS crown 115°, 130°, 305°. Numerous anomalies SS, SW. Small anomalies NSS, SW
TRCT7-0022	44.3	OK	Small SW anomalies at 260°, 290°, 295°, 300°, 310°, 320° SS. SW anomalies between 65° and 80°
TRCT7-0023	47.9	2 crown anomalies 255° and 265° NSS	No change at 255° and 265°

TIRECO CUT-SECTION ANALYSIS
TT07-2961

Test No.	SS OSS Wedge Under		SS OSS Wedge Under		#1 Belt Width	#2 Belt Width	Nylon	SS OSS #1 Belt Offset		SS OSS #2 Belt Offset	
	#1 Belt		#2 Belt								
TRCT7-0011	None	.08	.04	.05	6.30	6.04	Edge	.20	.20	.05	.00
TRCT7-0012	.10	.09	None	None	6.62	6.15	Edge	.05	.10	-.12	-.17
TRCT7-0013	.06	.07	None	None	7.50	7.00	Edge	.00	.17	-.20	-.20
TRCT7-0014	.08	.10	None	None	7.45	7.02	Edge	.15	.20	-.08	-.02
TRCT7-0015	.10	.07	N/A	N/A	6.70	N/A	Edge	N/A		N/A	
TRCT7-0016	.19	.16	None	None	7.30	6.63	Edge	.46	.45	.12	.06
TRCT7-0017	.10	.10	None	None	7.10	6.55	Edge	.55	.55	.35	.18
TRCT7-0020	.08	.08	None	None	6.50	6.00	Edge	.23	.25	.00	.00
TRCT7-0021	.14	.10	None	None	6.45	5.95	Edge	.35	.17	.14	-.20
TRCT7-0022	.15	.12	None	None	7.73	7.10	Edge	.40	.37	.07	.00
TRCT7-0023	.11	.12	None	None	7.72	6.90	Edge	.50	.38	-.03	.06

杭州中策橡胶有限公司致 TIRECO INC.的答复

Response to TIRECO INC. from Hangzhou Zhongce Rubber Co., Ltd.

日期：2007 年 7 月 9 日

Date: July 9, 2007

- 1、自 2006 年 6 月起所有销售给 TIRECO 的轻卡轮胎 DOT 识别代码中均不包括“FTS”字样。

All LTR tires supplied to Tireco Inc. did not and do not contain “FTS” in the TIN number.

- 2、为提前满足 FMVSS 139 标准的要求，截止到 2006 年 6 月 1 日，杭州中策生产的所有规格轻卡轮胎均包含肩部尼龙带束层，并均带有带束层边部胶条。所有销售给 TIRECO 的轻卡轮胎均使用该结构。自开始向 TIRECO 销售轻卡轮胎起至今，轮胎结构没有改变。

All subject LTR tires included an edge nylon cap and gum strips and met all FMVSS 139 standards by June 1, 2006 production. All subject tires sold to Tireco are of this construction. No major changes to construction have been made since inception of Tireco's production.

- 3、附表中说明所有销售给 TIRECO 轻卡轮胎的 DOT 识别代码的起始/终结时间，并包括增加尼龙带束层的时间。

Attached is a schedule listing out TIN numbers for all of Tireco's production. Also the schedule includes when the edge nylon cap was added.

- 4、相关轻卡轮胎结构的细节以及用以证明杭州中策生产的所有轻卡轮胎质量符合美国相关安全法规及标准内外部测试报告的进一步详细资料，请向我们的代理律师索取。

Please contact our attorneys regarding the further details of LTR tire construction and results of internal & external test of subject tires that demonstrate all Hangzhou made LTR tires meet and exceed all U.S. federal safety standards.

杭州中策橡胶有限公司
Hangzhou Zhongce Rubber Co., Ltd.

TIRECO LTR Tire Information from HZ

Brand	Size	LR/PR	Tread	TIN	DOT Code Start	DOT Code End	Edge Nylon Cap Start Date	First Date of Shipment
WESTLAKE	LT235/75R15	C/6PR	H280	7D MT	2106	2506	2106	7-Jun-06
WESTLAKE	LT235/85R16	E/10PR	H280	7D MR	2106	3306	2106	7-Jun-06
WESTLAKE	LT225/75R16	E/10PR	CR861	7D LT	2106	2506	2106	7-Jun-06
WESTLAKE	LT245/75R16	E/10PR	H280	7D NT	2106	3206	2106	7-Jun-06
WESTLAKE	LT245/75R16	E/10PR	CR861	7D NT	2106	3306	2106	7-Jun-06
WESTLAKE	LT245/75R16	E/10PR	CR860	7D NT	2506	3306	2106	14-Jun-06
WESTLAKE	LT245/75R16	E/10PR	CR857	7D NT	2506	2706	2106	28-Jun-06
WESTLAKE	LT265/75R16	E/10PR	H280	7D RT	2106	3306	2106	7-Jun-06
WESTLAKE	LT265/75R16	E/10PR	CR861	7D RT	2106	3306	2106	7-Jun-06
WESTLAKE	LT265/75R16	E/10PR	CR860	7D RT	2106	2606	2106	7-Jun-06
WESTLAKE	LT265/75R16	E/10PR	CR857	7D RT	2406	2606	2106	28-Jun-06
WESTLAKE	31X10.5R15LT	C/6PR	H280	7D RR	2106	2506	2106	7-Jun-06
MILESTAR	LT235/75R15	C/6PR	H280	7D MT	No Production			
MILESTAR	LT235/75R15	C/6PR	CR861	7D MT	5106		2106	12-Jan-07
MILESTAR	LT235/75R15	C/6PR	CR857	7D MT	5206		2106	19-Jan-07
MILESTAR	LT235/85R16	E/10PR	H280	7D MR	No Production			
MILESTAR	LT235/85R16	E/10PR	CR861	7D MR	5106		2106	12-Jan-07
MILESTAR	LT235/85R16	E/10PR	CR860	7D MR	5206		2106	19-Jan-07
MILESTAR	LT235/85R16	E/10PR	CR857	7D MR	5206		2106	12-Jan-07
MILESTAR	LT225/75R16	E/10PR	CR861	7D LT	3906		2106	27-Oct-06
MILESTAR	LT245/75R16	E/10PR	H280	7D NT	No Production			
MILESTAR	LT245/75R16	E/10PR	CR861	7D NT	3506		2106	28-Sep-06
MILESTAR	LT245/75R16	E/10PR	CR860	7D NT	3506		2106	28-Sep-06
MILESTAR	LT245/75R16	E/10PR	CR857	7D NT	3506		2106	28-Sep-06
MILESTAR	LT265/75R16	E/10PR	H280	7D RT	No Production			
MILESTAR	LT265/75R16	E/10PR	CR861	7D RT	3506		2106	28-Sep-06
MILESTAR	LT265/75R16	E/10PR	CR860	7D RT	3506		2106	28-Sep-06
MILESTAR	LT265/75R16	E/10PR	CR857	7D RT	3906		2106	27-Oct-06
MILESTAR	31X10.50R15LT	C/6PR	H280	7D RR	No Production			
MILESTAR	31X10.50R15LT	C/6PR	CR861	7D RR	5106		2106	12-Jan-07
MILESTAR	31X10.50R15LT	C/6PR	CR857	7D RR	5106		2106	12-Jan-07



Tire Testing & Analysis
Vehicle Testing & Performance Evaluation
Materials Testing & Technical Consulting
Management Consulting & Market Research

Smithers Scientific Services, Inc.

1150 NORTH FREEDOM STREET • RAVENNA, OHIO 44266
PH: 330/297-1495 FAX: 330/297-0038

RAVENNA DIVISION

Web: www.smithersscientific.com
E-mail: info@smithersmail.com

September 7, 2006

Dave Williams
Smithers Scientific Services Akron
425 West Market St.
Akron, Ohio 44303-2009

Phone: (330) 762-7441
Fax: (330) 762-7447

Dear Mr. Williams,

Enclosed are the test reports for the tires that you submitted for Global Tire:

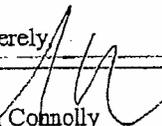
<u>Type of Test:</u>	<u>Tire ID</u>	<u>RAY No:</u>
Endurance	225/60R16 98H	017-4211
High Speed	Goodride H600	017-4212
Label/Measure/Bead Unseat/Plunger		017-4213
Endurance	LT 235/85R16	017-4207
High Speed	Westlake Telluride	017-4208
Label/Measure/Bead Unseat/Plunger	A/T CR861	017-4209

Every precaution was taken to ensure the accuracy of this test report. However, the information is provided subject to the condition that Smithers Scientific Services, Inc. will not be liable for any loss or damage resulting from use of this data. Should the results of this test be considered for advertising or promotional purposes, it should be noted that Smithers Scientific Services, Inc. does not allow the use of its name to be contained in advertising and/or promotional material.

Client acknowledges that the intended purpose for this testing is not for legal purposes. Should this intention change prior to test completion, client will notify Smithers immediately.

If you have any questions, please contact me at the above number. Smithers Scientific Services, Inc. appreciates your business and we look forward to being of service to Akron Smithers Scientific Services in the future.

Sincerely,


Sean Connolly
Technical Supervisor of Tire and Wheel Testing

"Creative Solutions Since 1925"

1 / 21

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

LABORATORY TEST REPORT

Test Type:	Endurance	Tire No:	017-4211
Client:	Smithers Scientific Services	Date Received:	25-Aug-2006
Client Test Spec:	Endurance	Technican:	DLM
Client Test No:			
Client's Tire No:	N/A		
Tire Manufacturer:	Hangzhou General Rubber Factory	Max Infl. (single):	44 Psi / 300 Kpa
Tire Brand:	Goodride	Max Infl. (dual):	N/A Psi / N/A Kpa
Tire Name:	H600	Max. Load (single)	1653 lb / 700 Kg
Tire Size:	225/60R16 98H	Max. Load (dual):	N/A lb / N/A Kg
Serial No.:	7DEXJF12606	DOT Symbol:	Yes
Construction:	Radial	Treadwear Incl.:	Yes
Tube Type:	Tubeless	Sidewall Colour:	BW
Load Range:	ST	Street/Deep Tread:	Street
Ply Rating:		Pretest Inspections	
No. Plies of S.W.:	2	Beads:	OK
No Plies of Tread:	6	Innerliner:	OK
Max Speed:	N/A	Sidewall:	OK
Carc. Cord Matr:	Polyester	Tread:	OK
Belt Cord Matr:	Poly/Stl/Nyl	Temperature:	A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>
Mold No.:	N/A	Treadwear:	500
Shore Duro:	N/A	Traction:	A
Wheel Size	16 X 6.5		

Inboard Side Outboard Side Meets Requirement

DOT
TIN
Alpine Symbol

REASON FOR REMOVAL

Removal Date:	8/28/2006	Duration(Hours):	59.02
Reason:	TEST COMPLETE	Final Speed:	MPH 75 KPH 120.7008
Failure Code:		Distance:	Mile 4426.25 KM 7123.3589
Compliance:		Final Load:	LBS 2645 KG 1199.7519
Remarks:	SHOULDER CHUNKING, OPPOSITE SERIAL SIDE.		

Report Approved By: _____

h

Date: _____

9-5-06

Title: Tire Testing Coordinator

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

**LABORATORY TEST REPORT
TEST LOG**

Client Test No. _____ Tire No. 017-4211
 Client Test Spec. Endurance Position No. 2
 Client Tire No. N/A Machine No. 4

CONDITIONING

	Date	Time	PSI	Temperature
Start	25-Aug-2006	18:30	26	95
End	25-Aug-2006	21:30	26	95
Cond. Hours	3.00			

TIME	DATE	On Off	OP	MILES	MPH	LOAD	IN INFL	AMB Temp	Cycle Hours	Total Hours	Log Lgnd	REMARK
21:35	25-Aug-2006	ON	BG	0.000	75	1405	26	95	0.00	0.000	STR	TEST START
1:35	26-Aug-2006	ON	RF	300.000	75	1488		96	4.00	4.000	LD	LOAD CHANGE
7:35	26-Aug-2006	ON	RF	750.000	75	1653		95	6.00	10.000	LD	LOAD CHANGE
7:35	27-Aug-2006	ON	AW	2550.000	75	0		95	24.00	34.000	INS	COOL DOWN.
8:35	27-Aug-2006	OFF	TE	2625.000			25	95	1.00	35.000	INS	INSPECTION
8:46	27-Aug-2006	ON	TE	2625.000	75	1818	20	94	0.00	35.000	LD	LOAD CHANGE
12:46	27-Aug-2006	ON	RB	2925.000	75	1984		95	4.00	39.000	LD	LOAD CHANGE
16:46	27-Aug-2006	ON	RJ	3225.000	75	2149		95	4.00	43.000	LD	LOAD CHANGE
20:46	27-Aug-2006	ON	RJ	3525.000	75	2314		95	4.00	47.000	LD	LOAD CHANGE
0:47	28-Aug-2006	ON	AW	3826.250	75	2480		97	4.02	51.017	LD	LOAD CHANGE
4:47	28-Aug-2006	ON	RB	4126.250	75	2645		95	4.00	55.017	LD	LOAD CHANGE
8:47	28-Aug-2006	OFF	VE	4426.250			26	95	4.00	59.017	END	TEST COMPLETE

Remarks: SHOULDER CHUNKING, OPPOSITE SERIAL SIDE.

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

LABORATORY TEST REPORT

TEST LOG

Client Test No.		Tire No	017-4212
Client Test Spec	High Speed	Position No	6
Client Tire No.	N/A	Machine No	2

CONDITIONING

	Date	Time	PSI	Temperature
Start	29-Aug-2006	14:00	72	95
End	29-Aug-2006	17:00	72	95
Cond. Hours	3.00			

TIME	DATE	On Off	OP	MILES	MPH	LOAD	IN INFL	AMB Temp	Cycle Hours	Total Hours	Log Lgnd	REMARK
17:15	29-Aug-2006	ON	BG	0.000	50	2586	72	95	0.00	0.000	STR	TEST START,WARM UP
19:15	29-Aug-2006	ON	BG	100.000	50	0	80	100	2.00	2.000	CD	COOL DOWN.
21:15	29-Aug-2006	OFF	KM	200.000			74	100	2.00	4.000	INS	INSPECT/ADJUST PSI
21:29	29-Aug-2006	ON	KM	200.000	87	2586	72	99	0.00	4.000	SPC	SPEED CHANGE
21:59	29-Aug-2006	ON	BG	243.500	93	2586		100	0.50	4.500	SPC	SPEED CHANGE
22:29	29-Aug-2006	ON	KM	290.000	99	2586		99	0.50	5.000	SPC	SPEED CHANGE
22:59	29-Aug-2006	ON	KM	339.500	99	0		100	0.50	5.500	CD	COOL DOWN
23:59	29-Aug-2006	OFF	KM	438.500					1.00	6.500	INS	INSPECT
0:05	30-Aug-2006	ON	KM	438.500	105	2586		95	0.00	6.500	SPC	SPEED CHANGE
0:35	30-Aug-2006	OFF	AW	491.000				94	0.50	7.000	INS	INSPECT
0:55	30-Aug-2006	ON	AW	491.000	111	2586		94	0.00	7.000	SPC	SPEED CHANGE
1:25	30-Aug-2006	ON	AW	546.500	117	2586		100	0.50	7.500	SPC	SPEED CHANGE
1:55	30-Aug-2006	ON	AW	605.000	123	2586		100	0.50	8.000	SPC	SPEED CHANGE
2:25	30-Aug-2006	ON	AW	666.500	129	2586		100	0.50	8.500	SPC	SPEED CHANGE
2:55	30-Aug-2006	ON	AW	731.000	135	2586		99	0.50	9.000	SPC	SPEED CHANGE
3:00	30-Aug-2006	OFF	AW	742.250			89	97	0.08	9.083	END	TEST COMPLETE

Remarks: TREAD CHUNKING

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION
LABELING REQUIREMENTS**

CLIENT: <u>Smithers Scientific Services</u>	MANUFACTURE: <u>Hangzhou General Rubber Factory</u>
TEST NO: <u>017-4213</u>	TIRE SIZE: <u>225/60R16 98H</u>
TIRE NAME: <u>Goodride H800</u>	SERIAL OR DOT #: <u>7DEYJF12606</u>
RIM SIZE: <u>16 X 6</u>	DATE REC'VD: <u>08/25/06</u>

Compliance: Yes, No, or N/A

Requirements located on one sidewall-

The DOT symbol:	<u>Yes</u>
The identification number(TIN):	<u>Yes</u>
First Grouping (2 or 3 symbols) Manufactures assigned ID:	<u>Yes</u>
Second Grouping(1 or 2 symbols) Tire size for new tires, Retread matrix/size, or non-pneumatic ID:	<u>Yes</u>
Third Grouping(4 or less symbols) Manufactures brand name ID or optional description code:	<u>Yes</u>
Fourth Grouping(4 symbols) First 2 are Week and second 2 are year produced:	<u>Yes</u>

Requirements located on both sidewalls-

Letters and numbers not less than .078 inches high and raised above or sunk below the tire surface not less than .015 inch	<u>Yes</u>
Tire size:	<u>Yes</u>
Maximum load rating and corresponding maximum inflation:	<u>Yes</u>

PASSENGER TIRES-

If maximum inflation pressure is: 240,280,290,300,330,340,350, or 380 Kpa then each marking of that inflation pressure must be followed in parenthesis by the equivalent PSI rounded to the next higher whole number and the maximum load must be followed in parenthesis by the equivalent load in pounds rounded to the nearest whole number:

Max single load	<u>750 Kg (1653 lbs) at 300 kPa (44 psi)</u>	<u>Yes</u>
-----------------	--	------------

If maximum inflation pressure is 420 Kpa (60 PSI) then the tire must have permanently molded into or onto both sidewalls, in letters and numbers not less than 1/2 inch high, the words "Inflate to 60 PSI" or "Inflate to 420 kpa (60 PSI)"

Tires other than passenger N/A

For LT tires- the maximum permissible inflation pressure shown must correspond to the maximum load of the tire size as specified in one of the publications described in S4.1.1(b) of 571.139.(Tire and RIm Association) At the manufacturers option, the shown inflation pressure may be as much as 10 PSI (69 KPA) higher: N/A

Tires should be labeled as follows:
(marked on tires rated for single and dual load)

Max single load	<u>Kg (lbs) at kpa) psi)</u>	<u>N/A</u>
Max dual load	<u>Kg (lbs) at kpa) psi)</u>	<u>N/A</u>

(marked on tires rated for single load) (only one side)

Max single load	<u>Kg (lbs) at kPa (psi)</u>	<u>N/A</u>
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The speed restriction of the tire, if 55 mph, or less, shown as follows:

MAX SPEED	<u> </u>	mph	<u>N/A</u>
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Actual number of plies and the composition of the ply cord material in the sidewall, and, if different, in the tread area: SW 2-Poly TR 2-Poly,2-Stl,2-Nyl. Yes

The words "tubeless" or "tube type" as applicable: Tubeless Yes

The word " regrooveable" if tire is designed for regrooving: N/A

The word "radial" if a radial tire: Yes

The letter designating the tire load range: No

Test Performed by: KM

Test Date: 08/27/06

Report Approved by: [Signature]



Smithers Scientific Services
Ravenna Division
Plunger Test Results

Client:	Smithers	Manufacturer:	Hangzhou General Rubber Factory
Test Number:	017-4213	DOT Number:	7DEYF1 2606
Tire Name:	Goodride H600	Plunger Tip:	.75 Inch
Tire Size:	225/60R16 98 H		
Wheel Size:	16X8.5		

Conditioning Information:

	Date	Time	Pressure	Temp
Start	8/26/2006	1800	26	73
End	8/27/2006	1800	26	73
Total Conditioning Time				24

Summary of Test Results:

(Force Given in lbs : Displacement given in inches)

<u>Run Number:</u>	<u>Force:</u>	<u>Displacement:</u>	<u>Energy:</u>	<u>Comments:</u>
1	2623.905	4.869	6388	Breaking Point
2	2800.198	5.387	7542	Breaking Point
3	2723.804	5.276	7186	Breaking Point
4	2670.916	5.143	6868	Breaking Point
5	2529.882	5.593	7075	Breaking Point

Runs: 5

Average of all Breaking Runs:	2669.741	5.254	7012
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Required Minimum Energy:	2600	Average Energy Reached:	7011.8
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Test Compliance: Yes – Minimum Energy Exceeded

Test Performed By:	KM
Test Date:	8/27/2006
Test Approved By:	

Any reproduction and/or assimilation of the data provided must be reported accurately and in whole, as provided in this report.



Smithers Scientific Services
Ravenna Division
Physical Dimensions

Client: Smithers
Test Number: 017-4213
Tire Name: Goodride H600
Tire Size: 225/60R16 98 H
Wheel Size: 16X6.5

Manufacturer: Hangzhou General Rubber Factory
DOT Number: 7DEYF1 2606

Conditioning Information:

	Date	Time	Pressure	Temp
Start	8/26/2006	1800	26	73
End	8/27/2006	1800	26	73
Total Conditioning Time				24

Maximum Overall Diameter:	26.61		
Minimum Size Factor:	35.00		
Maximum Section Width:	8.98		
Overall Diameter:	26.59	Tread Width:	7.60
Actual Size Factor:	35.39	Durometer:	61.00
Tread Radius:	16.00	Tread Arc Width:	7.80
Weight:	25.85		

Section Width Measurements:

1	8.80
2	8.78
3	8.80
4	8.83
5	8.81
6	8.80
Average:	8.80

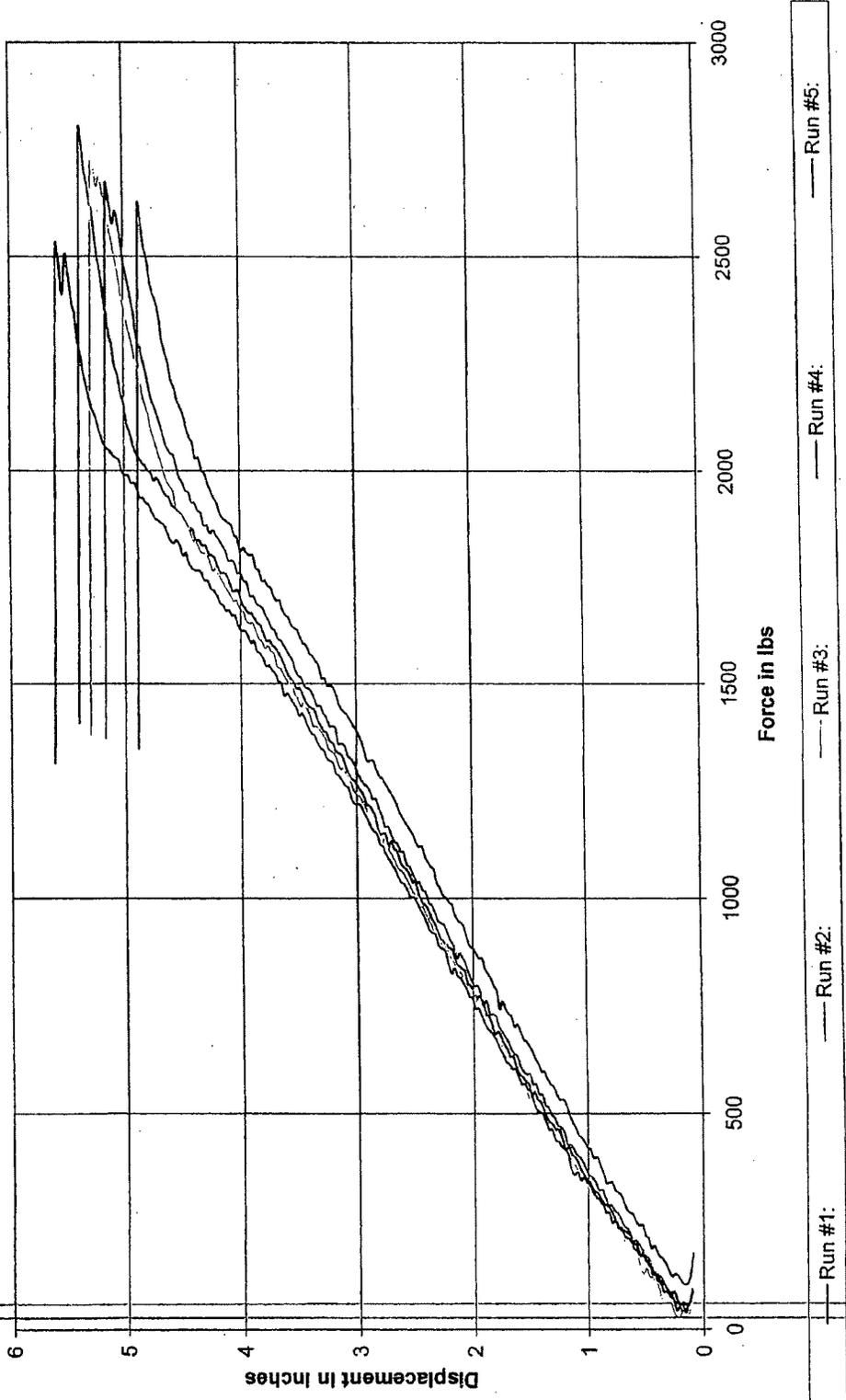
Is the Tread Wear Indicator at least 1/16 inch? **Yes**

Measurements Test Results: **Pass**

Test Performed By: KM
Test Date: 8/27/2006
Test Approved By: 

Any reproduction and/or assimilation of the data provided must be reported accurately and in whole, as provided in this report.

Plunger Energy Test 017-4213plunger





Smithers Scientific Services
Ravenna Division
Bead Unseat Test Results

Client:	Smithers	Manufacturer:	Hangzhou General Rubber Factory
Test Number:	017-4213beadunseat	DOT Number:	7DEYF1 2606
Tire Name:	Goodride H600		
Tire Size:	225/60r16 98 H		
Wheel Size:	16X6.5		

Conditioning Information:

	Date	Time	Pressure	Temp
Start	8/26/2006	1800	26	73
End	8/27/2006	1800	26	73
Total Conditioning Time				24

Summary of Test Results:

(Force Given in lbs : Displacement given in inches)

<u>Run Number:</u>	<u>Force:</u>	<u>Displacement:</u>	<u>Energy:</u>	<u>Comments:</u>
1	3478	4.53	7879	Breaking Point
2	3641	5.30	9644	Breaking Point
3	5377	5.40	14528	Breaking Point
4	3215	4.47	7188	Breaking Point
5	3547	4.83	8563	Breaking Point

Runs: 5

Average of all Breaking Runs:	3852	4.91	9560
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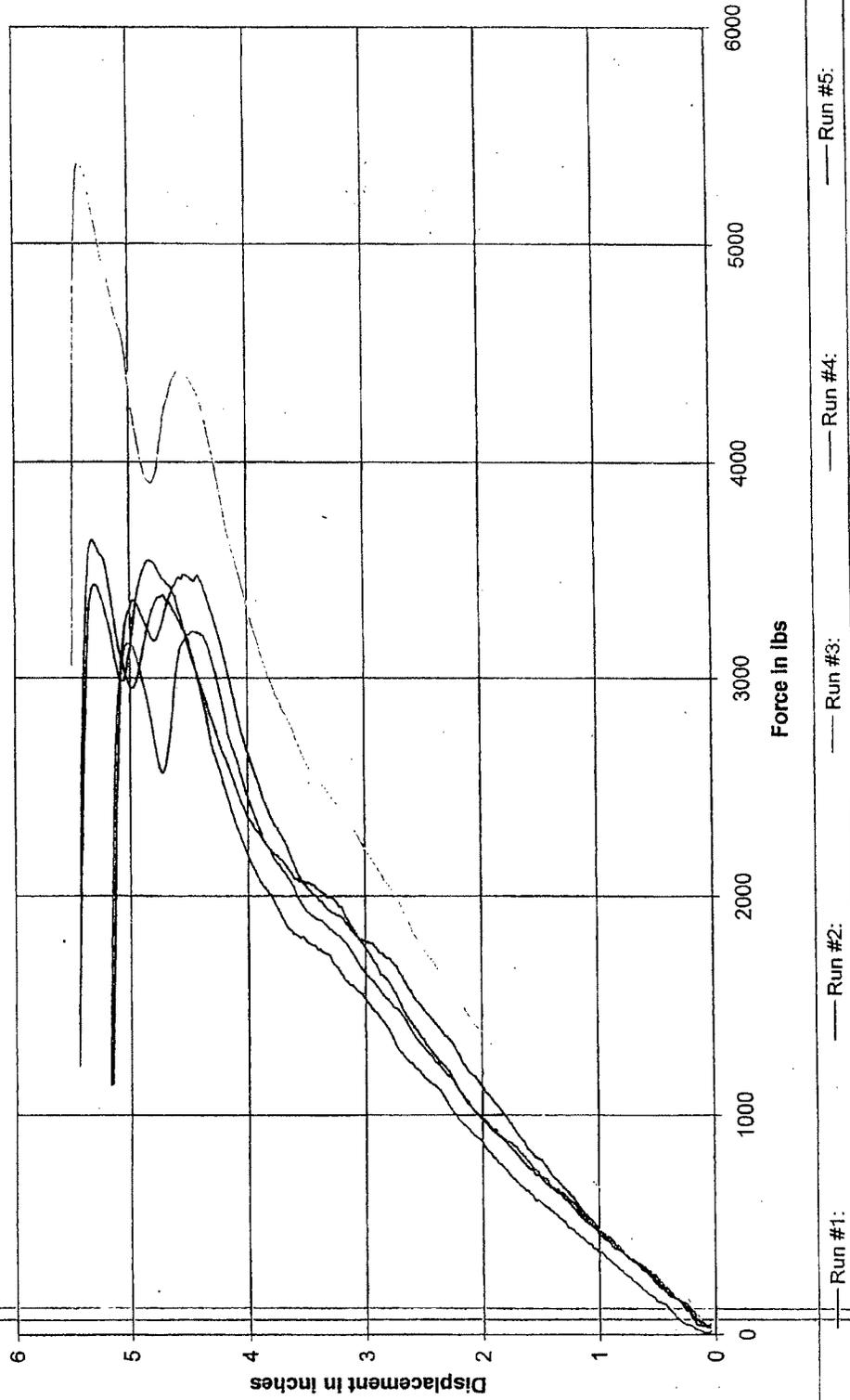
Required Minimum Energy:	2500	Average Energy Reached:	9560.4
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Test Compliance: Yes – Minimum Energy Exceeded

Test Performed By:		KM
Test Date:		8/27/2006
Test Approved By:		

Any reproduction and/or assimilation of the data provided must be reported accurately and in whole, as provided in this report.

Plunger Energy Test 017-4213beadunseat



**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

LABORATORY TEST REPORT

Test Type:	Endurance	Tire No:	017-4207
Client:	Smithers Scientific Services	Date Received:	25-Aug-2006
Client Test Spec:	Endurance	Technican:	DLM
Client Test No:			
Client's Tire No:	N/A		
Tire Manufacturer:	Hangzhou General Rubber Factory		
Tire Brand:	Westlake	Max Infl. (single):	80 Psi / 550 Kpa
Tire Name:	Telluride A/T CR861	Max Infl. (dual):	80 Psi / 550 Kpa
Tire Size:	LT235/85R16	Max. Load (single)	3042 lb / 1380 Kg
Serial No.:	7DMR2CI3006	Max. Load (dual):	2778 lb / 1260 Kg
Construction:	Radial	DOT Symbol:	Yes
Tube Type:	Tubeless	Treadwear Indi.:	Yes
Load Range:	E	Sidewall Colour:	BW
Ply Rating:		Street/Deep Tread:	Street
No. Piles of S.W.:	2	Pretest Inspections	
No Piles of Tread:	5	Beads:	OK
Max Speed:	N/A	Innerliner:	OK
Carc. Cord Matr:	Polyester	Sidewall:	OK
Belt Cord Matr:	Poly/St/Nyl	Tread:	OK
Mold No.:	N/A	Temperature:	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>
Shore Duro:	N/A	Treadwear:	
Wheel Size	16 X 6.5	Traction:	

Inboard Side Outboard Side Meets Requirement

DOT
TIN
Alpine Symbol

REASON FOR REMOVAL

Removal Date:	8/28/2006	Duration(Hours):	52.12
Reason:	TEST COMPLETE	Final Speed:	MPH 75 KPH 120.7008
Failure Code:		Distance:	Mile 3908.75 KM 6290.5234
Compliance:		Final Load:	LBS 4563 KG 2069.7421
Remarks:	BEAD SPLIT 360 DEGREES, OPPOSITE SERIAL SIDE. AIR LOSS		

Report Approved By: _____

Date: _____

Title: Tire Testing Coordinator

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

LABORATORY TEST REPORT

TEST LOG

Client Test No.	Tire No	017-4207
Client Test Spec. Endurance	Position No	1
Client Tire No. N/A	Machine No	4

CONDITIONING

	Date	Time	PSI	Temperature
Start	25-Aug-2006	18:30	59	95
End	25-Aug-2006	21:30	59	95
Cond. Hours	3.00			

TIME	DATE	On Off	OP	MILES	MPH	LOAD	IN INFL	AMB Temp	Cycle Hours	Total Hours	Log Lgnd	REMARK
21:35	25-Aug-2006	ON	RJ	0.000	75	2586	58	95	0.00	0.000	STR	TEST START.
1:35	26-Aug-2006	ON	RF	300.000	75	2738		95	4.00	4.000	LD	LOAD CHANGE
7:35	26-Aug-2006	ON	RF	750.000	75	3042		95	6.00	10.000	LD	LOAD CHANGE
7:35	27-Aug-2006	ON	AW	2550.000	75			95	24.00	34.000	INS	COOL DOWN.
8:35	27-Aug-2006	OFF	RB	2625.000			57	96	1.00	35.000	INS	INSPECTION
8:46	27-Aug-2006	ON	RB	2625.000	75	3346	46	96	0.00	35.000	LD	LOAD CHANGE
12:46	27-Aug-2006	ON	RB	2925.000	75	3650		95	4.00	39.000	LD	LOAD CHANGE
16:46	27-Aug-2006	ON	RJ	3225.000	75	3955		95	4.00	43.000	LD	LOAD CHANGE.
20:46	27-Aug-2006	ON	RJ	3525.000	75	4259		96	4.00	47.000	LD	LOAD CHANGE
0:46	28-Aug-2006	ON	RJ	3825.000	75	4563		96	4.00	51.000	LD	LOAD CHANGE
1:53	28-Aug-2006	OFF	RJ	3908.750				96	1.12	52.117	END	TEST COMPLETE

Remarks: BEAD SPLIT 360 DEGREES, OPPOSITE SERIAL SIDE. AIR LOSS

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

LABORATORY TEST REPORT

Test Type:	High Speed	Tire No:	017-4208
Client:	Smithers Scientific Services	Date Received:	25-Aug-2006
Client Test Spec:	High Speed	Technican:	DLM
Client Test No:			
Client's Tire No:	N/A		
Tire Manufacturer:	Hangzhou General Rubber Factory	Max Infl. (single):	80 Psi / 550 Kpa
Tire Brand:	Westlake	Max Infl. (dual):	80 Psi / 550 Kpa
Tire Name:	Telluride A/T CR861	Max. Load (single)	3042 lb / 1380 Kg
Tire Size:	LT235/85R16	Max. Load (dual):	2778 lb / 1260 Kg
Serial No.:	7DMR2CL3006	DOT Symbol:	Yes
Construction:	Radial	Treadwear Indl.:	Yes
Tube Type:	Tubeless	Sidewall Colour:	BW
Load Range:	E	Street/Deep Tread:	Street
Ply Rating:		Pretest Inspections	
No. Plies of S.W.:	2	Beads:	OK
No Plies of Tread:	5	Innerliner:	OK
Max Speed:	N/A	Sidewall:	OK
Carc. Cord Matr:	Polyester	Tread:	OK
Belt Cord Matr:	Poly/Stl/Nyl	Temperature:	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>
Mold No.:	N/A	Treadwear:	
Shore Duro:	N/A	Traction:	
Wheel Size	16 X 6.5		

Inboard Side Outboard Side Meets Requirement

DOT
TIN
Alpine Symbol

REASON FOR REMOVAL

Removal Date:	8/30/2006	Duration(Hours):	8.05
Reason:	TEST COMPLETE	Final Speed:	MPH 123 KPH 197.94931
Failure Code:		Distance:	Mile 611.15 KM 983.55059
Compliance:		Final Load:	LBS 2586 KG 1172.9899
Remarks:	TREAD CHUNKING		

Report Approved By: _____

Date: _____

Title: Tire Testing Coordinator

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION**

1150 N. Freedom St. Ravenna, OH44266 Phone: (330)-297-1495 Fax: (330)-297-0038

LABORATORY TEST REPORT

TEST LOG

Client Test No.		Tire No	017-4208
Client Test Spec	High Speed	Position No	2
Client Tire No.	N/A	Machine No	2

CONDITIONING

	Date	Time	PSI	Temperature
Start	29-Aug-2006	14:00	72	95
End	29-Aug-2006	17:00	72	95
Cond. Hours	3.00			

TIME	DATE	On Off	OP	MILES	MPH	LOAD	IN INFL	AMB Temp	Cycle Hours	Total Hours	Log Lgnd	REMARK
17:15	29-Aug-2006	ON	BG	0.000	50	2586	72	95	0.00	0.000	STR	TEST START
19:15	29-Aug-2006	ON	BG	100.000	50	0	80	97	2.00	2.000	CD	COOL DOWN.
21:15	29-Aug-2006	OFF	KM	200.000			75	95	2.00	4.000	INS	INSPECT/ADJUST PSI
21:29	29-Aug-2006	ON	KM	200.000	87	2586	72	95	0.00	4.000	SPC	SPEED CHANGE
21:59	29-Aug-2006	ON	BG	243.500	93	2586		98	0.50	4.500	SPC	SPEED CHANGE
22:29	29-Aug-2006	ON	KM	290.000	99	2586		98	0.50	5.000	SPC	SPEED CHANGE
22:59	29-Aug-2006	ON	KM	339.500	99	0		94	0.50	5.500	CD	COOL DOWN.
23:59	29-Aug-2006	OFF	KM	438.500				96	1.00	6.500	INS	INSPECTION
0:05	30-Aug-2006	ON	KM	438.500	105	2586		95	0.00	6.500	SPC	SPEED CHANGE
0:35	30-Aug-2006	OFF	AW	491.000				95	0.50	7.000	INS	INSPECT
0:55	30-Aug-2006	ON	AW	491.000	111	2586		95	0.00	7.000	SPC	SPEED CHANGE
1:25	30-Aug-2006	ON	AW	546.500	117	2586		94	0.50	7.500	SPC	SPEED CHANGE
1:55	30-Aug-2006	ON	AW	605.000	123	2586		95	0.50	8.000	SPC	SPEED CHANGE
1:58	30-Aug-2006	OFF	AW	611.150			67	98	0.05	8.050	END	TEST COMPLETE

Remarks: TREAD CHUNKING

**SMITHERS SCIENTIFIC SERVICES
RAVENNA DIVISION
LABELING REQUIREMENTS**

CLIENT: Smithers Scientific Services MANUFACTURE: Hangzhou General Rubber Factory
 TEST NO: 017-4209 TIRE SIZE: LT235/65R16
 TIRE NAME: Westlake Telluride A/T SERIAL OR DOT #: 7DMR2CL3006
 RIM SIZE: 16 X 6.5 DATE REC'VD: 08/25/06

Compliance: Yes, No, or N/A

Requirements located on one sidewall-

The DOT symbol: Yes
 Tire Identification number(TIN): Yes
 First Grouping (2 or 3 symbols) Manufactures assigned ID: Yes
 Second Grouping(1 or 2 symbols) Tire size for new tires, Retread matrix/size, or non-pneumatic ID: Yes
 Third Grouping(4 or less symbols) Manufactures brand name ID or optional description code: Yes
 Fourth Grouping(4 symbols) First 2 are Week and second 2 are year produced: Yes

Requirements located on both sidewalls-

Letters and numbers not less than .078 inches high and raised above or sunk below the tire surface not less than .015 inch Yes
 Tire size: Yes
 Maximum load rating and corresponding maximum inflation: Yes

PASSENGER TIRES-

If maximum inflation pressure is: 240,280,290,300,330,340,350, or 390 Kpa then each marking of that inflation pressure must be followed in parenthesis by the equivalent PSI rounded to the next higher whole number and the maximum load must be followed in parenthesis by the equivalent load in pounds rounded to the nearest whole number: N/A

Max single load Kg (lbs) at kPa (psi) N/A

If maximum inflation pressure is 420 Kpa (60 PSI) then the tire must have permanently molded into or onto both sidewalls, in letters and numbers not less than 1/2 inch high, the words "Inflate to 60 PSI" or "Inflate to 420 kpa (60 PSI)" N/A

Tires other than passenger

For LT tires- the maximum permissible inflation pressure shown must correspond to the maximum load of the tire size as specified in one of the publications described in S4.1.1(b) of 571.139. (Tire and Rim Association) At the manufacturer's option, the shown inflation pressure may be as much as 10 PSI (69 KPA) higher: Yes

Tires should be labeled as follows:

(marked on tires rated for single and dual load)

Max single load 1360 Kg (3042 lbs) at 550 kpa' 80 psi) Yes

Max dual load 1260 Kg (2778 lbs) at 550 kpa 80 psi) Yes

(marked on tires rated for single load) (only one side)

Max single load Kg (lbs) at kPa (psi) N/A

The speed restriction of the tire, if 55 mph, or less, shown as follows: mph N/A

Actual number of plies and the composition of the ply cord material in the sidewall, and, if different, in the tread area: SW: TR: Yes

The words "tubeless" or "tube type" as applicable: Yes

The word " regrooveable" if tire is designed for regrooving: N/A

The word "radial" if a radial tire: Yes

The letter designating the tire load range: Yes

Test Performed by:
 Report Approved by:

Test Date: 8-26-06



Smithers Scientific Services
Ravenna Division
Physical Dimensions

Client:	Smithers	Manufacturer:	Hangzhou General Rubber Factory
Test Number:	017-4209	DOT Number:	7DMR2CL3006
Tire Name:	Westlake Telluride A/T		
Tire Size:	LT235/85R16		
Wheel Size:	16x6.5		

Conditioning Information:

	Date	Time	Pressure	Temp
Start	8/25/2006	1800	80	74
End	8/26/2006	1800	80	73
Total Conditioning Time				24

Maximum Overall Diameter:		32.36
Minimum Size Factor:		40.24
Maximum Section Width:		9.80
Overall Diameter:	31.28	Tread Width: 6.50
Actual Size Factor:	40.41	Durometer: 66.00
Tread Radius:	12.00	Tread Arc Width: 6.55
Weight:	42.70	

Section Width Measurements:

1	9.13
2	9.17
3	9.10
4	9.09
5	9.14
6	9.16
Average:	9.13

Is the Tread Wear Indicator at least 1/16 inch?	Yes
Measurements Test Results:	Pass

Test Performed By:	RJ
Test Date:	8/26/2006
Test Approved By:	

Any reproduction and/or assimilation of the data provided must be reported accurately and in whole, as provided in this report.



Smithers Scientific Services
Ravenna Division
Plunger Test Results

Client:	Smithers	Manufacturer:	Hangzhou General Rubber Factory
Test Number:	017-4209	DOT Number:	7DMR2CL3006
Tire Name:	Westlake Telluride A/T	Plunger Tip:	0.75 Inch
Tire Size:	LT235/85R16		
Wheel Size:	16x6.5		

Conditioning Information:

	Date	Time	Pressure	Temp
Start	8/25/2006	1800	80	74
End	8/26/2006	1800	80	73
Total Conditioning Time				24

Summary of Test Results:

(Force Given in lbs : Displacement given in inches)

<u>Run Number:</u>	<u>Force:</u>	<u>Displacement:</u>	<u>Energy:</u>	<u>Comments:</u>
1	3485.864	3.189	5559	Breaking Point
2	3468.235	3.259	5651	Breaking Point
3	3515.246	3.169	5570	Breaking Point
4	3803.191	3.403	6471	Breaking Point
5	3885.663	3.347	6168	Breaking Point

Runs: 5

Average of all Breaking Runs:

3591.640	3.273	5884
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Required Minimum Energy:

5100

Average Energy Reached:

5883.8

Test Compliance:

Yes -- Minimum Energy Exceeded

Test Performed By:

Test Date:

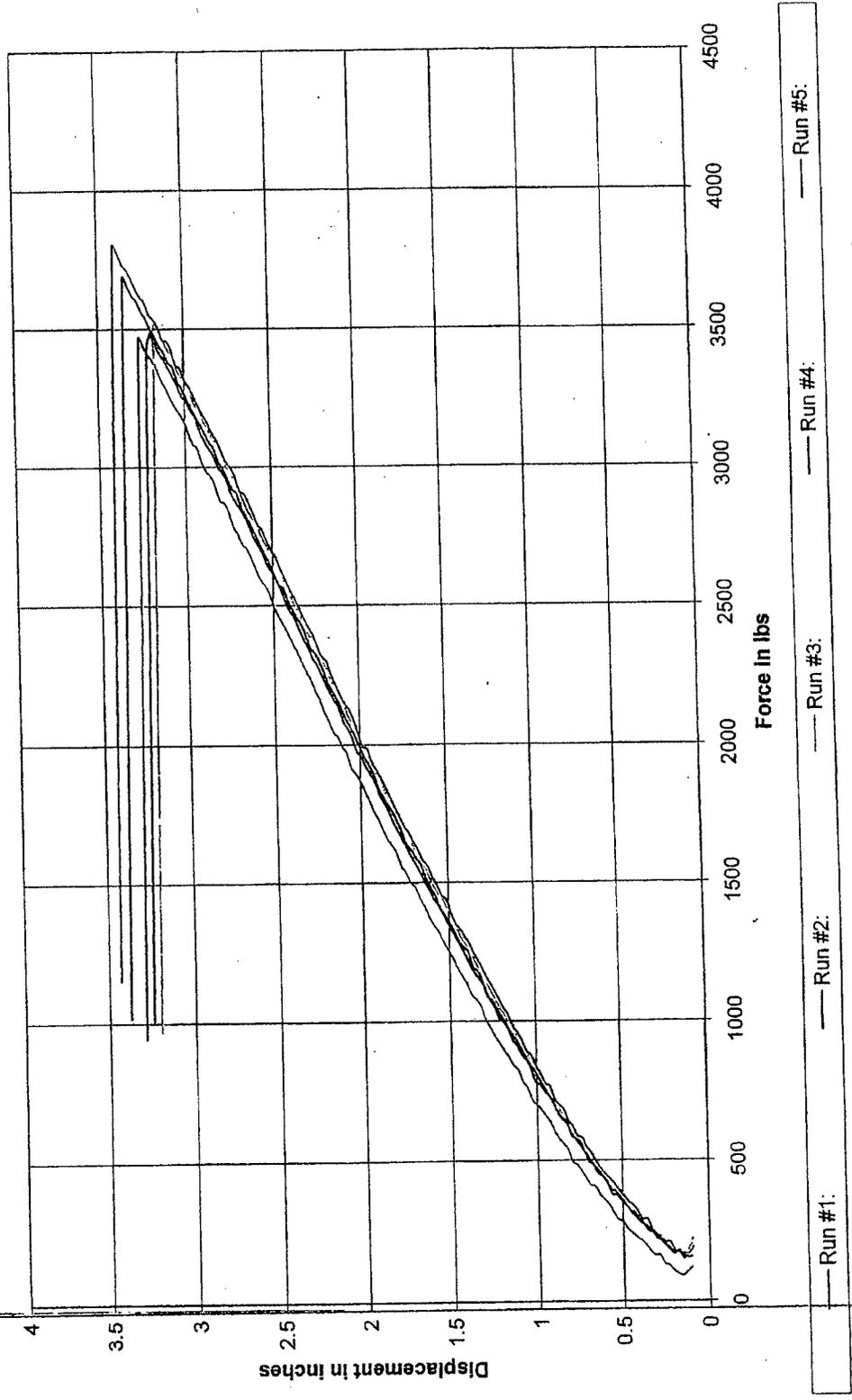
Test Approved By:

RJ

8/26/2006

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Plunger Energy Test 017-4209plunger





Smithers Scientific Services
Ravenna Division
Bead Unseat Test Results

Client:	Smithers	Manufacturer:	Hangzhou General Rubber Factory
Test Number:	017-4209beadunseat	DOT Number:	7DMR2CL3006
Tire Name:	Westlake Telluride AVT		
Tire Size:	LT235/85R16		
Wheel Size:	16x6.5		

Conditioning Information:

	Date	Time	Pressure	Temp
Start	8/25/2006	1800	80	74
End	8/26/2006	1800	80	73
Total Conditioning Time				24

Summary of Test Results:

(Force Given in lbs : Displacement given in Inches)

<u>Run Number:</u>	<u>Force:</u>	<u>Displacement:</u>	<u>Energy:</u>	<u>Comments:</u>
1	7544	2.73	10301	Maximum Force Exceeded
2	7539	2.60	9784	Maximum Force Exceeded
3	7539	2.72	10245	Maximum Force Exceeded
4	7549	2.74	10351	Maximum Force Exceeded
5	7580	2.86	10058	Maximum Force Exceeded

Runs: 5

Average of all Breaking Runs:

7546	2.89	10148
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Required Minimum Energy:

2500

Average Energy Reached:

10147.8

Test Compliance:

Yes - Minimum Energy Exceeded

Test Performed By:

Test Date:

Test Approved By:

RJ

8/26/2006

Any reproduction and/or assimilation of the data provided must be reported accurately and in whole, as provided in this report.

Plunger Energy Test 017-4209beadunseat

