

ORTECK INTERNATIONAL

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

07/05/2007

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

Dear Mr. George Pearson

Orteck understands its responsibility pursuant to (49 CFR 573.5,573.6,577.5 and 577.13) and is supplying the requested information as soon as the information becomes available. We have been in regular contact with Ric Willard regarding the recall. In order for Orteck to render it's opinion as to the validity of its involvement in the recall and whether or not the tires in question constitute a potential safety hazard to the public and therefore require a recall, we feel it is imperative that the HZ factory release any test data, technical data and the TINs of the suspect products. As of this date and we state in our response we have not received any information from our customers or the end user that leads Orteck to believe the particular brand and model we purchased from the HZ factory poses any threat to public safety. Once the HZ factory releases the requested information Orteck will be in a better position to analyze and render an opinion as to whether the particular tires we purchased may be affected by the recall. If subsequent information becomes available that would lead Orteck to believe the product we purchased from HZ may pose a potential safety defect we will advise your office immediately and institute a recall of any product that is deemed unsafe to the public.

As we are still gathering the test data results Orteck is requesting an extension so we can comply with questions 8,9 and 10. In reference to question 5 we are still gathering TIN data on any stock that may be in our customers inventories and will forward as soon as we compile.

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
Vice President
240-683-4640

Response to NHTSA

Question 1

LT235/75R15	YARTU CR857	LT235/75R15	WESTLAKE CR857
LT235/85R16	YARTU CR857	LT31X10.50R15	WESTLAKE CR857
LT245/75R16	YARTU CR857	LT265/75R16	WESTLAKE CR857
LT265/75R16	YARTU CR857		
LT31X10.50R15	YARTU CR857	LT265/75R16	GOODRIDE CR857

Question 2

At this time Orteck International has not been provided any technical data or product information from the HZ factory, our customers or the end user that would lead us to suspect that the above-mentioned tires contain a safety-related defect. In order for Orteck International to render its opinion as to whether the above product has a potential safety related defect it would need factory-supplied information as to when the “gum strips” were omitted or substantially reduced, the DOT codes of the affected product and corroborating evidence from independent testing facilities.

Question 3

As of this date the HZ factory has not supplied the range of TINs for the listed product.

<u>SIZE</u>	<u>MODEL</u>	<u>QUANTITY</u>
LT235/75R15	YARTU CR857	1056
LT235/85R16	YARTU CR857	6864
LT245/75R16	YARTU CR857	2610
LT265/75R16	YARTU CR857	4935
LT31X10.50R15	YARTU CR857	1560
LT235/75R15	WESTLAKE CR857	220
LT31X10.50R15	WESTLAKE CR857	325
LT265/75R16	WESTLAKE CR857	165
LT265/75R16	GOODRIDE CR857	<u>200</u>
	TOTAL	17,935

Question 4

A.

Parrish Tires
5130 Indiana Ave
Winston Salem, NC. 27106
336-767-0202
Contact: Mike Vargo

Dunlop & Kyle
280 Eureka St.
Batesville, MS. 38606
662-563-7601
Contact: Dennis King

LT235/75R15	YARTU CR857	792	LT235/75R15	YARTU CR857	264
LT235/85R16	YARTU CR857	5568	LT235/85R16	YARTU CR857	1296
LT245/75R16	YARTU CR857	2070	LT245/75R16	YARTU CR857	540
LT265/75R16	YARTU CR857	3735	LT265/75R16	YARTU CR857	1200
LT31X10.50R1	YARTU CR857	1170	LT31X10.50R15	YARTU CR857	<u>390</u>
LT235/75R15	WESTLAKE CR857	220			
LT31X10.50R15	WESTLAKE CR857	325		TOTAL	3,690
LT265/75R16	WESTLAKE CR857	165			
LT265/75R16	GOODRIDE CR857	<u>200</u>			
	TOTAL	14,245			

B.

As Orteck is an importer only, we do not sell directly to the end user therefore do not collect the tire registration form and the forward data, unless the form is mailed directly to us.

Question 5

Orteck is the process of asking its customers to verify the TINs for the FTS designation on any remaining product that we have supplied them listed on recall.

Question 6

As of this time Orteck has no claims or knowledge of any tread separations, blowout or belt-to-belt separations with the products in question.

- a) 0
- b) 0
- c) 0
- d) 0
- e) 0
- f) 0

Question 7

No documents at this time since answers to question six is none.

Question 8

In the process of gathering information and will forward when complete.

Question 9

If any additional testing was done in addition to the requirements in question 8 will forward all results.

Question 10

In the process of gathering information and will forward when complete.