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April 4, 2011

VIA EMAIL, FACSIMILE (202-366-7882) AND REGULAR MAIL

Associate Administrator for Enforcement (NVS-211)
National Highway Traffic Safety Administration
400 7th Street, SW, Room 5319
Washington, D.C. 20590

Re: Foreign Recall of Kumho Tires in China

Dear Associate Administrator for Enforcement (NVS-211):

Pursuant to 49 C.F.R. §579.11, Kumho Tire U.S.A., Inc. is reporting that Kumho Tire China Co., Inc. is voluntarily recalling tires in China. A copy of the press release from China's Administration of Quality Supervision, Inspection and Quarantine in Chinese and with an English translation concerning the recall is attached.

Pursuant to 49 C.F.R. §579.12, Kumho Tire provides the following information as required:

- a. The manufacturer of the tires is Kumho Tire Tianjin Co., Inc., located at No. 333 Zhongnan, 2ST. Teda, Tianjin, China.
- b. The tires being recalled in China involve the following models and sizes:

<u>Brand</u>	<u>Model</u>	<u>Size</u>
Kumho	KH18	P185/65R15 H04L
Kumho	758	P205/70R14 T04L
Kumho	KH25	P205/55R16 H04L
Kumho	KH25	P185/65R15 T04L
Kumho	KH25	P195/65R15 T04L

Kumho	KH17	P195/55R16 H04S
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The manufacturer of the tires has determined that the applicable DOT codes for the recalled tires are 2208, 4008, 0509, 0909, 2410, 2910 and 0111. The recall population was determined based upon the manufacturer's investigation.

- c. The total number of tires manufactured as set forth in b. above is 302,673 tires.
- d. The recall in China is a voluntary recall. The basis of the recall is that some tires manufactured as set forth in b. above may have contained extruded reworked rubber in excess of its own internal guidelines. The tires included in the recall population have undergone testing and have all exceeded Federal Motor Vehicle Safety Standards and other governmental regulations, as well as Kumho Tire's own internal test standards. Moreover, the Chinese government has also undertaken testing of tires from the recall population and has determined that all tires meet governmental regulations.
- e. The foreign recall is being undertaken in China.
- f. Kumho Tire's testing has determined that the tires from the recall population comply with and exceed governmental regulations and Kumho Tire's own internal test standards. However, it has decided to conduct a voluntary recall in China.
- g. The recall is a voluntary recall by Kumho Tire China Co., Inc.
- h. Kumho Tire will provide free replacement of the recalled tires. Kumho Tire will also hold free inspection campaigns in China for six months and will replace any tires that meet the replacement conditions for free.
- i. The recall in China will commence on April 15, 2011.
- j. Kumho Tire U.S.A., Inc. imported and sold 8,076 total tires for the following brands, models and sizes in the United States.

<u>Brand</u>	<u>Model</u>	<u>Size</u>
Kumho	KH18	P185/65R15 H04L
Kumho	758	P205/70R14 T04L
Kumho	KH25	P185/65R15 T04L
Kumho	KH25	P195/65R15 T04L

Kumho	KH17	P195/55R16 H04S
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None of the tires sold or imported into the United States were included as original equipment tires for any vehicle sold in the United States.

As noted above, based upon testing of the tires, the tires included in the recall population exceed the requirements set forth in Federal Motor Vehicle Safety Standards. However, Kumho Tire U.S.A., Inc. requests that National Highway Traffic Safety Administration (“NHTSA”) advise it as to whether NHTSA would like Kumho Tire U.S.A., Inc. to conduct a voluntary recall of the 8,076 tires sold in the United States.

We will await NHTSA’s response to Kumho Tire U.S.A., Inc.’s inquiry above. If there is anything further that you require, please let us know.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

LITTLETON JOYCE UGHETTA PARK & KELLY LLP



Michael H. Bai

Enclosures