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DEFECTS INVESTIGATION

BRIDGESTONE/FIRESTONE, INC

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August 16, 2000

00F-005 (01)

Mr. Kenneth Weinstein
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, DC 20590

**Re: Recall of Certain Firestone Radial ATX, ATX II and Wilderness AT Tires;
NSA-12rad, PE00-020**

Dear Mr. Weinstein:

As you are aware, Bridgestone/Firestone, Inc. has initiated a voluntary safety recall campaign with respect to certain tires specified below.

While the incidents leading to this action are rare in comparison to the population at issue, and Bridgestone/Firestone has noted significant indications of maintenance issues and tire damage as causal factors, widespread media reports have heightened customer concerns. In order to address these concerns, as well as to resolve any potential issue that these tires may contain a defect that relates to motor vehicle safety, Bridgestone/Firestone has decided to conduct the voluntary safety recall campaign described below.

Bridgestone/Firestone provides the following information in accordance with 49 C.F.R. section 573.5:

1. The manufacturer of the motor vehicle equipment in issue is Bridgestone/Firestone, Inc.

2. The tires included in the campaign are certain Firestone brand products in the Radial ATX, Radial ATX II, and Wilderness AT tire lines. The specific tires included in the campaign are:

- All Firestone Radial ATX and Radial ATX II tires in size P235/75R15 produced in North America from January 1991 through August 2000.
- All Firestone Wilderness AT tires in size P235/75R15 produced at the Decatur, Illinois manufacturing facility (DOT VDHLxxx xxx) from March 1996 through August 2000.

The recall population was determined by identifying the entire production period for all size P235/75R15 Radial ATX and Radial ATX II tires manufactured at all plants, and identification of the entire production of size P235/75R15 Wilderness AT tires at the Decatur, Illinois facility.

3. Bridgestone/Firestone estimates that approximately 14.4 million of these recalled tires have been produced and that 3.8 million of the subject Radial ATX and Radial ATX II tires and 2.7 million of the subject Wilderness AT tires remain in use and are subject to the recall.

4. Bridgestone/Firestone estimates that only an exceedingly low percentage, a small fraction of one percent, of the tires subject to the campaign potentially are subject to the failures at issue. The data available to Bridgestone/Firestone indicates the following:

- The tires in the affected population have overall adjustment rates that are consistent with rates for other tire lines produced by Bridgestone/Firestone and which fall well within the ranges of normal adjustment rates.

- While our records show a number of reported incidents and claims involving the subject tires, those constitute well below .02% of the tire population in question.
 - Where Firestone has had the opportunity to conduct detailed technical analyses of failures of the tires in question, it has found no particular design or systemic manufacturing defect. Instead, as is consistent with known data about the likely causes of failure of all tires, indications of improper maintenance or tire injury have commonly been found.
5. The tire failure condition leading to the notification campaign is tread belt separation. Typically, in such a failure a separation develops between the two steel belts of the tire. The separation may then propagate and, if not noted through normal tire inspection or typical vehicle feedback mechanisms (i.e., vibration, noise), progress to the point of complete or partial detachment of the outer steel belt and tread package.
6. Bridgestone/Firestone's decision to conduct the subject notification and recall campaign was made on August 8, 2000. From the outset of production of the subject tires, Bridgestone/Firestone conducted the typical activities it uses to follow, monitor, and evaluate the field performance of all of its tire lines. It bears noting that given the external environment in which tires operate, all large production tire lines experience reported failures, accidents, and claims. The evaluation of data relating to the subject tire lines did not demonstrate the presence of a defect. Evaluation by Bridgestone/Firestone's Product Analysis Department indicated that most failures were attributable to maintenance and external causes typical to all tire failures (see evaluation data previously submitted in PE00-020). Underinflated operation appeared to be a common causal factor in many of the tires examined. The

predominant vehicles using the tires in question (Ford Explorer/Mercury Mountaineer) call for 26 p.s.i. front and rear, these pressures were often not adhered to in the case of the returned tires. After the initiation of PE00-020, Bridgestone/Firestone independently and in conjunction with Ford Motor Company conducted additional analyses of available data related to the tires subject to that inquiry. That evaluation indicated the substantial majority of reported claims and incidents relating to Radial ATX and Radial ATX II tires were in the P235/75R15 size and in the P235/75R15 size Wilderness AT size tires produced at the Decatur facility. Despite the absence of any identified design defect or systemic manufacturing defect, and the countervailing evidence from specific tire evaluations, Bridgestone/Firestone determined to conduct the notification and recall campaign.

7. Bridgestone/Firestone's remedial program consists of no charge replacement of tires subject to the campaign that have not been previously removed from service and are on the consumer's vehicle. Based on the committed availability of vehicle owner information from the vehicle manufacturer, Bridgestone/Firestone is prepared to begin mailing notification letters to owners starting August 26, 2000 and complete the process by October 14, 2000. In the interim, Bridgestone/Firestone is assembling its own registration and sales data to identify aftermarket purchasers and is conducting a large-scale publicity effort to provide general public awareness of the availability and terms of the replacement remedy. This includes full-page advertisement throughout the United States and dissemination of recall information on two Internet sites: <http://www.bridgestone-firestone.com> and <http://www.firestones.com>.

Bridgestone/Firestone has already begun to make replacement tires available in all areas. Bridgestone/Firestone will be using all of its global resources and available competitor tire supply to meet consumer needs. Bridgestone/Firestone anticipates meeting all consumer requirements by the end of the first quarter 2001. The attached consumer letter addresses detailed procedures. Our approach is to be responsive to consumer tire requirements in all states, however, if supply indicates we are not meeting requirements in certain regions, tire redistribution may occur.

Our commitment is to replace all recalled tires as quickly as possible. We are asking all of our stores and retailers in every state to respond immediately to their customers, replacing the recalled tires with competitors' tires, if necessary.

- Consumers who exchanged recalled tires between January 1, 2000 and August 8, 2000 at a company-owned Firestone Tire & Service Center or authorized Bridgestone/Firestone retailer may have paid a prorated fee for those tires. Consumers are urged to pick up a reimbursement form at a company-owned Firestone Tire & Service Center or authorized Bridgestone/Firestone retailer and follow the instructions on the form.
- For recalled tires that were replaced in a non company-owned Firestone Tire & Service Centers or by a non authorized Bridgestone/Firestone retailer with competitors' tires between August 9 (the first day of the recall) and August 16, reimbursements will be limited to \$100 per tire including applicable mounting

and balancing charges and taxes. Consumers are urged to pick up a reimbursement form for this situation as well, at a company-owned Firestone Tire & Service Center or authorized Bridgestone/Firestone retailer and follow the instructions on the form.

- As of August 17, we urge all consumers to have recalled tires replaced at a Firestone Tire & Service Center, authorized Bridgestone/Firestone retailer, or a Ford dealer. Consumers with questions regarding this refund procedure please contact 1-800-465-1904.

Following consultation with Ford Motor Company, Bridgestone/Firestone further recommends that owners of Ford Explorers, Mercury Mountaineers, and Mazda Navajos maintain a tire pressure of 30 p.s.i. in all tires on their vehicles. The Ford Motor Company has indicated this pressure is in an acceptable range for these vehicles. The increased inflation pressure should reduce the potential for tire damage and deterioration due to operation below the inflation level previously recommended by the vehicle manufacturer.

8. Copies of communications to distributors and dealers are enclosed and additional materials will be provided as they are developed.
9. A copy of Bridgestone/Firestone's proposed owner notification letter is enclosed.

Bridgestone/Firestone's primary contact with respect to these issues is:

Robert J. Wyant
Div. Vice President, Corporate Quality Assurance

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We stand ready to provide any additional information that may be requested and invite any inquiries you may have.

Sincerely,



R. J. Wyant
Division Vice President
Corporate Quality Assurance

CC: Mr. Jonathan White
Division Chief Recall Analysis Division
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400 Seventh St., S.W.
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