



Kumho Tire U.S.A., Inc.  
14605 Miller Ave.  
Fontana, CA 92336-1695

Associate Administrator for Safety Assurance (NSA-01)  
National Highway Traffic Safety Administration  
400 7<sup>th</sup> St. S.W.  
Washington D.C. 20590

047-008 1/8

Dear Sir or Madam,

Kumho Tire U.S.A., Inc. has determined that approximately 5,085 Kumho V710 tires may not meet the minimum durability test requirements as mandated in CFR Title 49 Part 571 Section 109 Sub-Part 5.4. FMVSS 109 durability testing has yielded inconsistent results.

Brand Name: Kumho  
Design Name: ECSTA V710  
Production Serial Dates: 3103-1404 inclusive

Tire Size	Serial	Serial Dates	Number of tires Produced to Date
205/50R15	H2F2YA5B	3103-1404	954
265/45R16	H2T6YA5B	3103-1404	1105
275/40R17	H2MWYA5B	3105-1404	703
295/40R17	H2RAYA5B	3105-1404	546
315/35R17	H2UTYA5B	3105-1404	745
335/35R17	H2B5YA5B	3103-1404	508
315/35R18	H2R9YA5B	3103-1404	524

DEFECTS INVESTIGATION  
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TOTAL 5085

The ECSTA V710 is a competition tire designated for use in the Sports Car Club of America's Showroom Stock and Solo competition series. It is manufactured by Kumho Tire Co., Inc. in Korea and distributed in the U.S. by Kumho Tire U.S.A., Inc. (14605 Miller Ave, Fontana, CA 92336 Ph.1-800-445-8646). Tires have been sold to:

	Current Sales	Current Inventory	Sold
* Kumho America Technical Center (KATC) in Akron, OH (Tires for use by drivers under contract to Kumho)	1343 tires	259 tires	1084
* The Tire Rack	2021 tires	818 tires	1203
* CUT Inc/Vilven Tire	140 tires	40 tires	100
* Ken Towrey Tire	133 tires	0 tires	133
* Reinalt-Thomas Corp.	94 tires	0 tires	94
* Fairmont Tire	16 tires	0 tires	16
* Global W. Suspension Comp	8 tires	0 tires	8
* Les Schwab	6 tires	0 tires	6
* American Tire Distributors	4 tires	0 tires	4
* Kauffman Tire	2 tires	0 tires	2
*Speed Concept	2 tires	0 tires	2
*S.P.I.	59 tires	0 tires	59
<b>TOTAL</b>	<b>3828 tires</b>	<b>1117 tires</b>	<b>2711</b>

Sales of the ECSTA V710 were voluntarily suspended on Friday April 2, 2004. All distributors are in the process of notifying customers to remove tires from service and return them to Kumho Tire U.S.A., Inc. in accordance with the instructions in the "The Announcement".

The following notifications have been issued;

"The Announcement" – copy attached released April 5 and posted on;

- Kumho's web site – kumhotireusa.com  
Kumho Tire U.S.A., Inc. has suspended sales of the ECSTA V710 effective April 2, 2004 and instructed distributors to handle returns in accordance with the terms and conditions described in "The Announcement".
- The Tire Rack's web site – tirerack.com  
Tire Rack has agreed to handle tire returns in accordance with the terms specified in "The Announcement".
- SCCA's web site – SCCA.org  
The SCCA has suspended the ECSTA V710 from competition until the tire is redeveloped.

On April 6, 2004 "The Announcement" was provided to industry trade magazines and publications;

- Modern Tire Dealer
- Tire Review
- Tire Business
- The Smithers Report

A copy of "The Announcement" is attached to this memo. We are in the process of completing the Part 573 Defect and Noncompliance Report but do not yet have all of the information. The root cause of the noncompliance and therefore the remedy are unknown at this time and internal investigations are underway. Kumho Tire U.S.A., Inc. will report our findings as information becomes available.

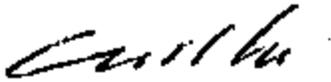
This initial notification is being prepared and sent to your office in the desire to comply with the initial 5-day reporting period. Kumho became aware of the noncompliance issue on Friday April 2, 2004. Since that time we have:

1. Suspended sales of the Kumho ECSTA V710.
2. Issued The Announcement to dealers and instructed them on how to have the tires returned.
3. Posted The Announcement on the following web sites:
  - a. Kumhotireusa.com
  - b. Tirerack.com
  - c. SCCA.org
4. Posted The Announcement with industry trade publications
5. Initiated an exhaustive search for the root cause of noncompliance to S5.4 of FMVSS 109. This work is taking place in Korea. We will report as we get information on the root cause and the eventual solution.
6. Filed this petition with the NHTSA

Kumho Tire U.S.A, Inc. is in the process of completing the Part 573 Defect and Noncompliance Report and will file with your office in the very near future.

Sincerely,

04T-008 (3/8)



C.H. Kim  
Senior Customer Service Engineer  
Kumho Tire U.S.A., Inc.  
Ph. 909-428-3341

**Safety Defect and Noncompliance Report Guide for Equipment**  
**PART 573 Defect and Noncompliance Report**

**On April, 2, 2004, Kumho Tire U.S.A., Inc. decided that a noncompliance with Federal Motor Vehicle Safety Standard No. 109 exists in items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 CFR Part 573 Defect and Noncompliance Reports.**

**Date this report was prepared:** April 7, 2004

**Furnish the manufacturer's identification code for this recall (if applicable):** N/A

**L. Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.**

The tires are imported. For purposes of this report, the designated agent as prescribed by 49 U.S.C. §30164 is Kumho Tire U.S.A., Inc., 14605 Miller Ave., Fontana, CA 92336

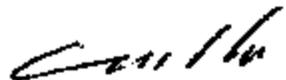
**Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.**

**Telephone Number:** 909-428-3341

**Fax No.:** 909-428-3995

**Name and Title of Person who prepared this report.**  
C.H. KIM, SENIOR CUSTOMER SERVICE ENGINEER

**Signed:**



**I. Identify the Recalled Items of Equipment**

2. Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: Tire

Make: KUMHO Model: ECSTA V710

Part Number: \_\_\_\_\_ Size: PLEASE SEE PARAGRAPH BELOW

Function: COMPETITION RACE TIRES

Other information which characterizes/distinguishes the items of equipment to be recalled:

<u>TIRE SIZE</u>	<u>SERIAL</u>	<u>SERIAL DATES</u>
205/50R15	H2F2YA5B	3103-1404
265/45R16	H2T6YA5B	3103-1404
275/40R17	H2MWYA5B	3105-1404
295/40R17	H2RAYA5B	3105-1404
315/35R17	H2UTYA5B	3105-1404
335/35R17	H2B5YA5B	3103-1404
315/35R18	H2R9YA5B	3103-1404

Other information which characterizes/distinguishes the items of equipment to be recalled:

Not applicable

Identify the approximate percentage of the production of all the recalled models manufactured by your company between the inclusive dates of manufacture provided above, that the recalled model population represents. For example, if the recall involved Widgets equipped with certain items of equipment from January 1, 1996, through April 1, 1997, then what was the percentage of the recalled Widgets of all Widgets manufactured during that time period.

Five thousand eighty-five (5,085) tires imported into the United States. Two thousand seven hundred eleven (2,711) tires sold in the market. Two thousand three hundred seventy-four (2,374) tires are accounted for and are in KUSA's and supplier's inventory.

**II. Identifying the Recall Population**

3. Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

<u>Model</u>	<u>Year</u>	<u>Number of Items Potentially Involved</u>
<u>KUMHO ECSTA V710</u>	<u>PRODUCTION SERIAL DATES: 3103-1404</u>	<u>2711</u>

Total Number Potentially Affected by the Recall:

2711

4. Furnish the approximate percentage of the total number of items of equipment estimated to actually

contain the defect or noncompliance: Unknown at this time how many tires may not be compliant.

**Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:**

The 2,711 tires were selected because this quantity includes the total amount of tires sold as of April 2, 2004. The basis for the beginning and final dates of manufacture of the tires is the first and final date of production. The first run of production occurred during the 31<sup>st</sup> week of 2003, which is identified by the Serial Date of each tire - 3103. The most recently produced tires occurred during the 14<sup>th</sup> week of 2004, which is also identified by the Serial Date of each tire - 1404. This time frame set the basis for the recalled items of equipment.

### III. Describe the Defect or Noncompliance

**5. Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.**

FMVSS 109 durability testing has yielded inconsistent results. The cause of the noncompliance is unknown at this time. Kumho Tire U.S.A., Inc. will report on the findings as information becomes available.

**Describe the cause(s) of the defect or noncompliance condition.**

Kumho Tire U.S.A., Inc. will report on the findings as information becomes available.

**Describe the consequence(s) of the defect or noncompliance condition.**

Kumho Tire U.S.A., Inc. will report on the findings as information becomes available.

**Identify any warning which can (a) precede or (b) occur.**

Kumho Tire U.S.A., Inc. will report on the findings as information becomes available.

**If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.**

#### SUPPLIER

#### ADDRESS

- \* Kumho America Technical Center (KATC)  
(Tires for use by drivers under contract to Kumho)
- \* The Tire Rack
- \* CUT Inc./Vilven Tire
- \* Ken Towrey Tire
- \* Reinalt-Thomas Corp.
- \* Fairmont Tire
- \* Global W. Suspension Comp

711 Cleveland-Massillon Ave. Akron, OH 44333

7101 Vorden Parkway South Bend, IN 46628

104 North Park Royal, IL 61871

2103 Production Dr. Louisville, KY 40299

20225 N. Scottsdale Rd. Scottsdale, AZ 85255

P.O. Box 512037 Los Angeles, CA 90051-0037

1455 N. Linden Ave. Rialto, CA 92376

- \* Les Schwab
- \* American Tire Distributors
- \* Kauffman Tire
- \* Speed Concept

P.O. Box 667 Prineville, OR 97754  
 P.O. Box 1949 Huntersville, NC 28070-1949  
 2832 Anvil Block Rd. Ellenwood, GA 30294  
 20745 S.W. Tualatin Valley Hwy. Beaverton, OR 97006

**Identify the name and title of the chief executive officer or knowledgeable representative of the supplier:**

Kumho Tire U.S.A., Inc. will report on the findings as information becomes available.

**IV. Provide the Chronology in Determining the Defect/Noncompliance**

*If the recall is for a defect, complete item 6, otherwise item 7.*

**6. With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.**

Not applicable.

**7. With respect to a noncompliance, identify and provide the test results or other data (in chronological order and including dates) on which the noncompliance was determined.**

Kumho Tire U.S.A., Inc. will provide the test results upon receipt.

**V. Identify the Remedy**

**8. Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.**

Kumho Tire U.S.A., Inc. will report the findings as information becomes available.

**Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.**

Kumho Tire U.S.A., Inc. will report the findings as information becomes available.

**Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.**

Kumho Tire U.S.A., Inc. will report on the correction once the noncompliance is rectified.

**VI. Identify the Recall Schedule**

**Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.**

Kumho Tire U.S.A., Inc. has issued an announcement, which is posted at Kumho Tire U.S.A., Inc.'s web site – kumhotireusa.com, The Tire Rack's web site – tirerack.com, and SCCA's web site – SCCA.org; sales of the ECSTA V710 tires were suspended on April 2, 2004; distributors have been instructed to handle returns; and the announcement was placed in Modern Tire Dealer, Tire Review, Tire Business and The Smithers Report.

#### VII. Furnish Recall Communications

**9. Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification. A DRAFT copy of the notification documents should be submitted to this office by Fax (202-366-7882) for review prior to mailing.**

**Note: These documents are to be submitted separately from those provided in accordance with Part 573.8 requirements.**