

**TBC CORPORATION**

28 June 2012

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: Defect Notifications Pursuant to Part 573

Dear Ms. Lewis,

Yokohama Tire Corporation (YTC) has decided to voluntarily recall a population of 72,938 tires manufactured by YTC at its plant in Salem, Virginia (Plant Code CC). These tires were sold exclusively to TBC Corporation and marketed by TBC through its retail network under several TBC brand names. The following information is submitted in accordance with 49 CFR Part 573.

Identification of Recalled Tires:

This recall involves the tires described in the table below. All of the subject tires were manufactured in YTC's Salem Virginia factory from January 2009 through January 2011 (weeks 0409 through 0411)

<u>Size</u>	<u>Description</u>	<u>YTC Part No</u>	<u>Tire Identification Nos</u>	<u>Qty</u>
235/70R16	MIRADA Cross Tour SLX	34619	CC6RV2H1009 thru CC6RV2H5010	12,492
265/70R17	MIRADA Cross Tour SLX	34623	CC70V2L0409 thru CC70V2L0411	19,668
235/70R16	BIG FOOT BIG O S/T	34521	CC6RV151009 thru CC6RV155010	21,294
265/70R17	BIG FOOT BIG O S/T	34525	CC70V190409 thru CC70V190411	19,484

The subject MIRADA Cross Tour SLX and the BIG FOOT BIG O S/T, tires were manufactured by YTC for TBC Corporation since January 2009. MIRADA Cross Tour SLX and BIG FOOT BIG O S/T tire brands are owned exclusively by TBC Corporation.

### Description of the Condition Prompting this Action

A small number of tires within the recall population may have been produced with irregular geometry in the lower sidewall. Under certain limited circumstances this irregular geometry can potentially spawn a lower sidewall crack and cause a loss of tire inflation.

### Chronology

In November 2010, YTC observed an elevation of warranty returns for lower sidewall cracking of the subject tires during a warranty review. YTC immediately initiated an investigation to determine the potential cause (s) and extent of this condition. YTC confirmed that the affected tires were manufactured within specification and that they met and exceeded all applicable internal and external standards including those of FMVSS 139.

Since a lower sidewall crack condition is usually associated with tires that have experienced prolonged over-deflection due to either overloading or under-inflation, YTC investigated in-service use as a potential cause of the condition observed in the returned tires. YTC's investigation included new product analysis and testing, warranty returns analysis, in-service analysis, and field interviews with dealers and tire owners.

From January 2011 through December 2011, YTC thoroughly inspected and analyzed warranty returns, performed fatigue drum testing, conducted extensive cut sampling and section analysis of cured tires in the plant, and audited the manufacturing processes associated with the subject tires. All warranty returned tires were mounted, checked, and verified for air retention.

In January 2012, YTC received a report that a customer had experienced an air loss as indicated by his TPMS sensor, and that the customer's tire subsequently went flat while the vehicle was garaged. When the tire was returned and analyzed, a lower sidewall crack was found to exist and determined to be the likely cause of the tire deflation. Further analysis indicated that the lower sidewall crack developed as a result of irregular geometry at the location of the initial sidewall crack formation.

Subsequent investigation of warranty returns during March and April 2012 indicated that some of the returned tires exhibited an irregular geometry in the areas adjacent to the sidewall cracking. In some cases the tires exhibited cracks that extended to the tire's structure, potentially posing a risk to the tires' air retention capabilities. YTC's analysis to date indicates that this specific geometry is present in only a small quantity of tires and that the condition may result in slow, rather than rapid air loss.

On 21 June 2012, based upon the foregoing testing and analysis, YTC decided to commence a voluntary recall of the subject tires out of an abundance of caution.

There have been no reports of any accident, injury or death related to this reported tire condition.

### Description of Remedy Program

YTC, in cooperation with TBC Corporation will conduct a voluntary recall of these subject tires. Customers who registered their tires will be notified by mail by TBC and requested to bring their vehicles and tires to TBC Corporation dealers for inspection and replacement at no cost to the owner. The tire replacement program will be conducted through 31 October 2012.

TBC dealers performing the inspection service and tire replacements will be notified of their duties and responsibilities in accordance with 49CFR Part 573.6 (c) (9). Dealers will be instructed to send all recalled tires directly to a processing point for delivery to YTC for accounting and disposal.

Pre-Notification Remedy Reimbursement Program

Pursuant to Part 577.11 (e), YTC requests that it be exempt from the pre-notification remedy reimbursement requirements. All of the subject tires are within the manufacturer's limited warranty.

Dealer and Owner Notification Schedule

TBC will handle dealer and owner communications for this recall. We have been advised that TBC Corporation plans to notify its dealers and distributors of this recall on or about 15 July 2012 and that TBC will notify owners on or about 20 July 2012.

Recall Monitoring and Reporting

YTC in cooperation with TBC will submit for six, consecutive, calendar quarters, status reports concerning the current progress of this recall campaign beginning in the third quarter 2012.

Sincerely,

A handwritten signature in cursive script that reads "L. M. Hardy" followed by a circled number "9".

L. M. Hardy  
V.P. Sales Technical Support  
And Quality Assurance