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(5 pages)

MICHELIN
A better way forward

24 July 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division NVS-215
1200 New Jersey Avenue, SE.,
Washington, DC 20590

Attn : Ms. Nancy L. Lewis
NHTSA NVS-200

Dear Ms. Lewis,

Following up on my phone conversation with Ms. Jennifer Timian of 23 July 2012, attached find our Part 573 Report concerning the BFGoodrich Commercial T/A A/S and Uniroyal Laredo HD/H brand tires. In the coming days, I will follow up with the draft of MNA's owner notification letter. For questions, my contact information is listed below.

Sincerely,

John R. Emerson
Director, Industry Standards & Government Regulations
Michelin North America, Inc
515 Michelin Road
Post Office Box 1987
Greenville, SC 29602-1987

24 July 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division NVS-215
1200 New Jersey Avenue, SE.,
Washington, DC 20590

Attn : Ms. Nancy L. Lewis
NHTSA NVS-200

Re: Part 573 Defect Information Report

Pursuant to the requirements of 49 C.F.R. Part 573, Michelin North America (MNA) submits the following report related to certain tires manufactured under Federal Motor Vehicle Safety Standards FMVSS139 (New Pneumatic Tires for Motor Vehicles with a GVWR of 4,536 kgs (10,000 lbs) or less.

Pursuant to 49 C.F.R. § 573, MNA reports the following :

573.6(c)(1) Name of Manufacturer:

Michelin North America, Inc.

573.6(c)(2)(iii) Items Potentially Containing the Defect:

The tires involved can be identified as follows –

LT 235/85 R16 120 Q BF Goodrich Commercial T/A A/S LRE
DOT TIN BF0RJD11 and DOT date range 1310 thru 2912.

LT 245/75 R16 120 Q BF Goodrich Commercial T/A A/S LRE
DOT TIN BE11JD11 and DOT date range 1310 thru 0312.
DOT TIN BF11JD11 and DOT date range 1311 thru 5211.

LT 235/85 R16 120 Q Uniroyal Laredo HD/H LRE
DOT TIN BF0RJDUU and DOT date range 1310 thru 2912.

LT 245/75 R16 120 Q Uniroyal Laredo HD/H LRE
DOT TIN BE11JDUU and DOT date range 1310 thru 0312.
DOT TIN BF11JDUU and DOT date range 1311 thru 5211.

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573.6(c)(3) Total Number of Tires Potentially Containing the Defect:

Approximately 841,000 of the subject tires produced in our Tuscaloosa, Alabama, and Fort Wayne, Indiana plants are involved, of which approximately 799,900 have been sold in the US market. The quantities by dimension and brand are as follows -

LT 235/85 R16 120 Q BF Goodrich Commercial T/A A/S LRE
Quantity : 304,800 produced
288,300 sold in the US market

LT 245/75 R16 120 Q BF Goodrich Commercial T/A A/S LRE
Quantity: 383,100 produced
373,900 sold in the US market

LT 235/85 R16 120 Q Uniroyal Laredo HD/H LRE
Quantity : 81,900 produced
76,200 sold in the US market

LT 245/75 R16 120 Q Uniroyal Laredo HD/H LRE
Quantity : 71,200 produced
61,500 sold in the US market

573.6 (c)(4) Percentage of Tires Estimated to Actually Exhibit the Defect:

Up to 100% of the approximately 799,900 tires released to the replacement market described above could be affected during service. As of July 18, 2012, approximately 0.017 % of the total market population has exhibited a loss of tread or rapid air loss condition. This equates to approximately 143 tires.

573.6(c)(5) Description of the Defect

Tires of the DOT date ranges identified have the possibility of developing a separation at the tread belt edge, first evidenced by a ride vibration or irregular wear, which could lead to a loss of tread, and, in some cases, rapid air loss, presenting a risk to motor vehicle safety.

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573.6(c)(6) Basis For Determination of the Defect:

March-May 2012: Several instances of tread/belt endurance issues (characterized as ride vibrations, irregular wear, tread loss, or rapid air loss) were observed during systematic quality reviews. Although small in number, they were occurring early in the tire's wear life. Efforts were made to gather additional data.

May 22, 2012: A quality investigation was formally launched to analyze returned products in further detail, including an assessment showing an increased rate of return beginning 2nd quarter 2010. The investigation then focused on results from tires produced from 2nd quarter 2010 to present.

18 July 2012: Based on the quality investigation, a determination of defect was made and a start point for the scope of concern was established (week 13 2010). Design changes implemented from January to July 2012, the result of regular ongoing improvement efforts, positively impacted endurance performance, including the performance of the subject tires, and defined the end points for the scope of concern (see DOT date ranges above).

As of July 18, 2012, claims for belt separation totaled 0.084% of the total population. The belt separation claims that involved loss of tread and/or rapid air loss totaled 143, or 0.017% of the total population. Property damage claims associated with belt separations during the date range of the subject tires totaled 68, or 0.008% of the total population. No death or injury claims have been recorded.

The subject tires are typically used in commercial light truck and full-size heavy duty van applications.

573.6(c)(8) Remedy Program:

MNA will initiate a voluntary safety recall of the subject tires. The customers that may have purchased tires of the specified date ranges will be contacted by first class mail beginning the week of August 6, 2012. This correspondence will explain the issue, and include specific instructions as to how to obtain similar replacement products, as well as procedures for collecting reimbursement for remedies made prior to the recall, where appropriate. Owners may contact Michelin Consumer Care at 1-800-637-5527.

All tires in the specified DOT date ranges removed from service, or in our possession, will be scrapped.

573.6(c)(9) Disposition of Recalled Tires

In accordance with the provisions of 49 CFR Part 573.6(c)(9)(i-iii), MNA will make dealers aware of the requirements that become effective in connection with the disposition of all recalled tires through a Dealer Notification letter that will be submitted to the agency separately pursuant to 49 CFR Part 573.6(c)(10). The program for disposing of all recalled tires returned to MNA will comply with applicable state and local law regarding the disposal of tires, and to the extent possible, will be channeled into a category of positive reuse or beneficial non-vehicular reuse.

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573.6(c)(10) Owner Notification

A draft of MNA's owner notification letter will be forthcoming.

Sincerely,

John R. Emerson
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