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13T-004
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KUMHO TIRES

April 30, 2013

KUMHO TIRE U.S.A., INC.
10299 Sixth Street
Rancho Cucamonga, CA 91730
Tel.: (909) 428-3999
Fax: (909) 428-3989

VIA EMAIL (Jennifer.Timian@dot.gov) AND FEDERAL EXPRESS

Jennifer Timian, Esq.
Chief, Recall Management Division
United States Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Amended Part 573 Defect and Noncompliance Report

Dear Ms. Timian:

On August 1, 2012, Kumho Tire U.S.A., Inc. submitted a Part 573 report related to the recall of KUMHO SOLUS KH25 passenger car tires, size 225/45R17. Since its initial notification of the recall, Kumho Tire U.S.A., Inc. was made aware that some of the recalled tires that it sent to Liberty Tire Recycling, LLC ("Liberty") for disposal were resold by Liberty. After discussions with NHTSA, NHTSA has requested that Kumho Tire U.S.A., Inc. submit an Amended Part 573 report to NHTSA concerning the recall of the tires resold by Liberty.

Pursuant to the requirements of 49 C.F.R. Part 573 and at the request of NHTSA, Kumho Tire U.S.A., Inc. submits this amended report related to the amended voluntary recall of 11,922 tires manufactured by Vietnam Kumho Tire Co., Ltd. and sent to Liberty for disposal that were resold by Liberty.

573.6 (c)(1) Name of Manufacturer:

Vietnam Kumho Tire Co., Ltd.

Corporate official, by name and title, whom the agency should contact with respect to notification and person preparing this report:

C.H. Kim
V.P. Quality & Service
Kumho Tire U.S.A., Inc.
10299 6th St.
Rancho Cucamonga, CA 91730
Telephone: 909-428-3341 or 909-428-3358
Fax No.: 909-428-3995



573.6 (c)(2)(iii) Identification of Recalled Tires

The amended recall involves recalled KUMHO SOLUS KH25 passenger car tires, size 225/45R17, that were sent to Liberty for disposal that Liberty resold. The amended recalled tire information is set forth in the table below:

Tire Size	Load Index & Speed Rating	Pattern	Load Range	Serial	Manufacture Date
225/45R17	91/H	KH25	B	K2X5YAL8	3411 – 2512

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

The total number of tires involved in this amended recall is 11,922 tires. Kumho Tire U.S.A., Inc. sent these 11,922 recalled tires to Liberty for disposal. Of the 11,922 tires, Kumho Tire U.S.A., Inc. has been advised by Liberty that 9,612 tires are on hold and allocated and /or have been destroyed by Liberty. Liberty has advised Kumho Tire U.S.A., Inc. that the number of tires sold by Liberty to tire wholesalers are as follows:

<u>Number of Items Potentially Involved</u>	<u>Number of Items on Hold and Allocated and/or Destroyed</u>	<u>Number of Items Sold by Liberty Tire Recycling to Customers that Have Not Been Retrieved</u>
11,922 ¹	9,612 ²	2,310

573.6 (c)(4) Approximate Percentage of Tires Estimated to Actually Contain the Defect or Noncompliance

Up to 100% of the 11,922 tires could be affected by the recall.

573.6 (c)(5) Description of the Defect or Noncompliance

The tires subject to the recall may have the possibility of developing cracking in the sidewall, which could result in air loss.

573.6 (c)(6) Chronology of Principal Events

The recall tires identified in this report relate to Kumho Tire U.S.A., Inc.’s initial hold and allocated recall tire quantities detailed in its Part 573 report, dated August 1, 2012, for NHTSA

¹ Kumho Tire U.S.A., Inc. initially advised Liberty that it had sent 12,170 tires for disposal. Kumho Tire U.S.A., Inc. believes that the total number of tires sent to Liberty is 11,922.

² Liberty notified Kumho Tire U.S.A., Inc. on April 29, 2013, that it had destroyed 4,395 tires, that Liberty’s wholesalers/retailers have destroyed 517 tires and that Liberty’s wholesalers/retailers have quarantined 4,700 tires, which total 9,612 tires.

573.6 (c)(2)(iii) Identification of Recalled Tires

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

The total number of tires involved in this amended recall is 11,922 tires. Kumho Tire U.S.A., Inc. sent these 11,922 recalled tires to Liberty for disposal. Of the 11,922 tires, Kumho Tire U.S.A., Inc. has been advised by Liberty that 9,264 tires are on hold and allocated and /or have been destroyed by Liberty. Liberty has advised Kumho Tire U.S.A., Inc. that the number of tires sold by Liberty to tire wholesalers are as follows:

<u>Number of Items Potentially Involved</u>	<u>Number of Items on Hold and Allocated and/or Destroyed</u>	<u>Number of Items Sold by Liberty Tire Recycling to Customers that Have Not Been Retrieved</u>
11,922 ¹	9,612 ²	2,310

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The tires subject to the recall may have the possibility of developing cracking in the sidewall, which could result in air loss.

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No. 12T-020.

Between August 6, 2012 and August 8, 2012, Kumho Tire U.S.A., Inc. paid Liberty to dispose of 11,922 recalled tires from its warehouse in Itasca, IL. Instead, sometime after August 8, 2012, Liberty sold 7,875 tires to various tire wholesalers in Texas, New York, North Carolina and Puerto Rico.

Once Kumho Tire U.S.A., Inc. became aware of the unauthorized resale of these tires, Kumho Tire U.S.A., Inc. contacted Liberty to confirm whether it resold these recalled tires. After learning that Liberty sold these recalled tires, Kumho Tire U.S.A., Inc. has sought Liberty's assistance in locating these recalled tires. Kumho Tire U.S.A., Inc. has also sought the advice of NHTSA to determine how to proceed in reporting this matter and removing these tires from the marketplace.

On April 30, 2013, based on NHTSA's request, Kumho Tire U.S.A., Inc. commenced an amended voluntary recall of the resold recalled tires.

There have been no reports of any accident, injury or death regarding the tires recalled related to its reported condition.

573.6 (c)(8) Remedy Program

Kumho Tire U.S.A., Inc. will initiate an amended voluntary recall of the resold recalled tires. We have been working closely with Liberty to assist us in identifying the 2,310 tires that were sold to customers. These customers will be contacted by first class mail beginning the week of May 6, 2013. We will also issue a notification to Liberty's tire wholesalers to return the affected tires to Liberty and to contact their customers who purchased the affected tires. The notifications will explain the basis for the original recall and include specific instructions as to how to obtain reimbursement.

The remaining 9,612 in the specified DOT date ranges that have been on hold and/or allocated will be or have been destroyed by Liberty. The tires that are returned will also be destroyed.

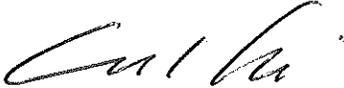
573.6 (c)(9) Disposition of Recalled Tires

Dealers performing the tire inspection and tire replacement service will be notified of their duties and responsibilities in accordance with the provisions of 49 C.F.R. Part 573.6(c)(9).

573.6 (c)(10) Notification

Kumho Tire U.S.A., Inc. will begin notifying Liberty's and its dealers and respective owners after we receive NHTSA's assigned unique safety recall identification number. At that time, we will submit our proposed owner notification letter for your review - in accordance with 49 C.F.R. Part 577 - and proceed accordingly.

Sincerely,

A handwritten signature in black ink, appearing to read 'C.H. Kim', written in a cursive style.

C.H. Kim
V.P. Quality & Service