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Daniel T. Campbell
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April 30, 2013

Via e-mail

Ms. Kelly Schuler
National Highway Traffic Safety Administration
Attn: Recall Management Division (NVS-215)
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: **NHTSA Campaign 13T-002 Quarterly Report (2013 Q1)**

Dear Ms. Schuler:

Per 49 C.F.R. § 573.7, below please find the quarterly report for the quarter ending March 31, 2013, submitted on behalf of Hercules Tire & Rubber Company ("Hercules Tire") for the above-referenced recall.

573.7(b)(1): NHTSA Campaign Number

Campaign Number 13T-002. The Hercules Tire identification number for this campaign is 01-2013.

573.7(b)(2): Notification Date

Hercules Tire began notifying customers and dealers of the above-referenced recall on February 27, 2013. Hercules Tire's customer and dealer notification is on-going.

573.7(b)(3): Number of Tires Involved

As reported in a revised Part 573 notice submitted on March 29, 2013, the (approximate) total number of potentially affected tires within the recall population in the United States is 102,000. Based on the normal useful life of the potentially affected tires and Hercules Tires' sales data, however, Hercules Tire estimates that only approximately 26,000 tires within the recall population would still be in service in the United States.

573.7(b)(4): Number of Items Inspected and Repaired or Determined Not in Need of Repair

Hercules Tire intends to replace all first purchasers' and dealers' tires within the recall population, regardless of whether they appear to contain the potential condition. Further, Hercules Tire intends to disable and dispose of all recalled tires in accordance with Hercules Tire's tire destruction plan. As of the end of the first quarter of 2013, Hercules Tire had recovered 763 recalled tires, including 194 tires returned by consumers, and 569 tires captured prior to their first use.[1]

573.7(b)(5): Number of Tires Determined to Be Unreachable

Hercules Tire's recall notification is on-going, and Hercules Tire is still in the process of determining how many first purchasers of recalled tires may be unreachable.

573.7(b)(6): Number of Tires Returned Prior to First Use

Hercules Tire captured and quarantined 569 recalled tires prior to their first use.

573.7(b)(7)(i)-(iii): Tires Not Properly Disabled, Disposed of, or Treated Contrary to Manufacturer's Direction

Hercules Tire is not aware of any instance in which a recalled tire has not been properly disabled or has been disposed of improperly. Hercules Tire is aware of one instance in which a dealer, Bauer Built (3014 Mall Drive, Eau Claire, WI 54701), mistakenly skived DOT codes from recalled tires, against Hercules Tire's instructions. Those tires were properly disabled, and pursuant to Hercules Tire's direction, the dealer re-affixed the DOT codes to the tires. Hercules Tire is not aware of any other instance in which a tire has not been treated in accordance with Hercules Tire's direction.

If you have any questions, please do not hesitate to contact me at (202) 624-2544 or dcampbell@crowell.com, or my colleague Rebecca Baden Chaney at (202) 624-2772 or rchaney@crowell.com.

Sincerely,

Rebecca Baden Chaney

Daniel T. Campbell
Rebecca Baden Chaney

cc: Hercules Tire

[1] As of April 26, 2013, Hercules Tire had recovered 522 tires from consumers, for a total of 1,091 tires.