



Daniel T. Campbell  
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January 30, 2014

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 Q4)**

Dear Ms. Schuler:

Per 49 C.F.R. § 573.7, below please find the quarterly report for the quarter ending December 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, and has sent out notification to all entities and individuals for whom it has contact information. Hercules Tire's customer and dealer notification is on-going, however, as it continues to receive contact information for some consumers and dealers.

**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 Tire's 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 fourth quarter of 2013, Hercules Tire had recovered 1,963 recalled tires, including 1,394 tires returned by consumers and dealers, and 569 tires captured prior to their first use.

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

It is unknown how many owners of the remaining potentially affected tires are unreachable. In some circumstances, Hercules Tire has discovered, tire distributors, dealers and sub-dealers did not maintain customer records. Hercules Tire continues to maintain a dedicated telephone line to field inquiries concerning the recall, and will continue to send notification to additional consumers and dealers whose contact information it receives.

**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 aware of some instances in which tire dealers erroneously treated recalled tires in accordance with Hercules Tire's instructions for making a warranty claim, rather than its recall instructions. Per Hercules Tire's protocol, however, tires for which warranty reimbursement is claimed are to be disabled in the same manner as recalled tires. Hercules Tire is not aware of any instance in which a recalled tire was not properly disabled. In some instances, tires for which warranty reimbursement was claimed may have been scrapped, rather than returned to Hercules Tire for recycling.

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

Sincerely,



Daniel T. Campbell  
Rebecca B. Chaney

cc: Hercules Tire