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By Recall Mangement Division at 3:37 pm, Jul 16, 2014

14T-008
(10 pages)



COOPERTIRES®

COOPER TIRE & RUBBER COMPANY
701 Lima Avenue • Findlay, OH 45840

JACK JAY MCCrackEN
ASSISTANT SECRETARY

PHONE: 419.424.4333
FAX: 419.831.6893
jjmccracken@coopertire.com

July 15, 2014

SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
1200 New Jersey Avenue, SE
West Building
Washington, D.C. 20590

Gentlemen:

Cooper Tire & Rubber Company has determined that a non-compliance with a federal motor vehicle safety standard exists in one thousand four hundred ninety-two (1,492) tires as set forth in the attached Defect and Noncompliance Information Report dated July 9, 2014.

These tires are being voluntarily recalled.

A copy of this letter, with attachments, is being faxed to the Office of Defects Investigation (ODI) for review by ODI of the proposed owner notification letters pursuant to 49 CFR Section 573.6(c)(10). We are asking ODI to approve the sample owner letters. Hard copy will follow. Unless advised otherwise by ODI, owner notification will begin July 24, 2014. Three copies of the appropriate notification to our customer are attached as an exhibit in response to Item 9 of the Defect and Noncompliance Information Report.

Our envelope format for owner recall notification letters, as required under 49 CFR 577.5(a), has been previously approved by ODI.

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
July 15, 2014
Page 2

Cooper will provide the required quarterly report on the status of the above-mentioned campaign.

Please advise of the NHTSA assigned campaign number.

Very truly yours,


Jay McCracken

Attachments

cc: Office of Defects Investigation "NSA-10"
Department of Transportation
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
1200 New Jersey Avenue, SE
West Building
Washington, D.C. 20590
Fax Number 202/366-1767
Attn: Mr. George Person
Recall Management Regulations

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: 7/9/14

NHTSA CAMPAIGN NO.

COOPER NO. 159

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

<u>BRAND NAME</u>	<u>OWNER</u>
WILD COUNTRY RADIAL XTX SPORT	TBC Corporation

2. POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
26S/65R18 Standard Load Tubeless Radial tires	UT 2214 – UT 2514 June 1, 2014 – June 28, 2014	1,492	100%

The recall population was based on our production records and inventory count reconciliations. The tires being recalled differ from similar items in that they were molded with a different DOT serial week and year in accordance with 49 CFR 574.5.

3. TOTAL UNITS POTENTIALLY AFFECTED: 1,492

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: 100%

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

5. **DESCRIPTION OF DEFECT OR NONCOMPLIANCE** (Including brief summary and detailed description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

The affected tires fail to comply with the requirements of 49 CFR 571.139 S6.3 Tire Endurance; specifically S6.3.2.(a). At various distances during the specified endurance test, the subject tires may develop and exhibit cracking and broken ply cords in the lower sidewall on the intended outboard side (white sidewall side) above the rim edge.

6. **CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT** (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

On 6/13/14, our Texarkana Plant Tire Testing Technician noticed the anomaly on a routine surveillance tire that had been produced during DOT serial week 2214. This initial test result was believed to be caused by a rim failure so a back-up tire was tested. On 6/25/14, this second tire failed to complete tire endurance phase of the test at 4011 kilometers. Production of the affected spec was stopped immediately and further testing initiated. Next, a tire from DOT serial week 2514 was sampled and tested with similar results. Finally, two additional tires produced during DOT serial week 2514 were then tested in our Findlay, Ohio testing center and on 7/2/14, the results confirmed the failure.

Our inventory has been completely sorted for these tires. During DOT serial weeks 2214 – 2514, there was a total net cure of 1,559 tires of which we have accounted for 67 tires in our warehouses. There were 1,492 tires distributed. Cooper is voluntarily recalling these 1,492 tires.

7. **COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:**

The existence of the condition was determined by a review of wheel test results, visual analysis, and cut tire analysis.

8. **STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:**

Tires with the affected DOT serial week and year identification numbers should be shipped to one of our Regional Inspection Points. All tires returned to Cooper will be inspected for the correct DOT identification number and all tires found to have the affected DOT serial numbers will be scrapped.

The tires located in our inventory count reconciliation will also be scrapped.

9. **ENCLOSURES, IF ANY** (Three copies of all notices, bulletins and other communications that were sent to more than one distributor, dealer or purchaser and relate directly to the defect or noncompliance):



COOPER TIRE & RUBBER COMPANY
Findlay, Ohio 45840 419-423-1321

July 2014

Mr. Tony Maddox
TBC Corporation
4770 Hickory Hill Road
Memphis TN 38141

Dear Mr. Tony Maddox,

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a non-compliance with a federal motor vehicle safety standard exists in all tires identified as follows:

Product Name	Size	DOT Serial Number	Brand
Wild Country Radial XTX Sport	265/65R18	UT C8 T5C 2214 thru 2514	TBC

Cooper Tire & Rubber Company has determined that the affected tires fail to comply with the requirements of 49 CFR 571.139 S6.3.2.(a) Tire Endurance. At various distances during the specified endurance test, the subject tires may develop and exhibit cracking and broken ply cords in the lower sidewall on the intended outboard side (white sidewall side) above the rim edge. The existence of the condition in the subject tires could cause them to experience loss of air pressure. This condition may increase the risk of tire failure and a vehicle crash.

Attached is a copy of the Defect and Noncompliance Information Report by which Cooper Tire & Rubber Company notified the National Highway Traffic Safety Administration (NHTSA) of its determination of the existence of the safety related defect. Section 159(1) of the National Traffic and Motor Vehicle Safety Act, as amended, states that the owner of the brand name under which the tire is marketed is deemed to be the manufacturer of such tires. Accordingly, pursuant to 49 CFR Part 573.3(d) you must make a determination of whether a safety defect exists in the above described tires. If you determine that such a defect exists, you must also provide the NHTSA with a defect and noncompliance information report (you may wish to incorporate by reference Cooper's defect and noncompliance information report).

Cooper Tire & Rubber Company is recalling all of the tires with the identification number(s) above. Effective immediately, you or your dealers must not sell any of the tires listed and described above.

TBC1590714

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions.

PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRES

NEW TIRES:

All recalled new tires existing in your inventory, or in your sub-dealers' inventories, should be returned immediately in one shipment, freight collect to the designated inspection point for your area as indicated on the attached map. To assure proper handling, these tires should be listed on the enclosed standard Tire & Tube Claim Form. In order to expedite the sorting and crediting process, please use a crayon and write the words, "New Recall" on the sidewall of the tire and on the Claim Form.

Upon verification by Cooper Tire that the tires returned are within the recall group, we will issue credit to you based upon your last invoice price of the tires.

USED TIRES:

TBC's registration records are being searched and consumers who have purchased tires with the subject identification number(s) are being notified of the RECALL. Attached for your information is a copy of the notification being sent to such consumers. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

We have advised the consumer to return his recalled tire(s) and his letter to you. If your inspection verifies that the consumer has a tire(s) with the suspect identification number, the tire(s) should be replaced, mounted and balanced at no charge, if presented for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire(s) is available (if not available at the time of the inspection). It is expected that replacement tire(s) will be available at the time of inspection. However, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) days, tires will be replaced under our normal adjustment policy.

We have advised the consumer that it will take approximately thirty (30) minutes each to replace the recalled tires. For any tires removed from consumer vehicles during such sixty (60) day period, Cooper Tire will authorize an allowance of \$17.50 per tire to cover mounting and balancing.

"YOU ARE PROHIBITED BY FEDERAL LAW FROM SELLING NEW OR USED TIRES COVERED BY THIS NOTIFICATION."

Tires removed from consumer vehicles must be listed on our standard Tire and Tube Claim Form. The Claim Form must be properly completed and signed by the consumer and the consumer's copy of the recall letter attached.

For the purpose of the RECALL, the Claim Form must include RECALL tires only. The

word "RECALL" must be printed directly below the name and address on the claim form. All tires should be identified in crayon with the Claim Form reference number per standard adjustment procedures. Also, please write the words, "Used Recall" on the sidewall of the tire.

Upon verification by Cooper Tire, credit will be issued to you on a no charge replacement basis if replaced by you and returned to Cooper on or before ninety (90) days after notice of this RECALL.

All Claim Forms for both "New Recall" and "Used Recall" tire(s) should be mailed to Cooper Tire & Rubber Company using the standard tire adjustment procedures. Please mail the claim forms one to two days before shipping the tires. Remember: DO NOT ship the Claim Forms with the tires.

You should return in one shipment all recalled new and used tires to the inspection point as indicated on the attached map. These tires should be classified as SCRAP and shipped as SCRAP RUBBER TIRES, freight collect. Freight collect privileges apply only within the prescribed time period. Any tires returned after the designated time will be handled under our regular tire adjustment procedures.

Cooper Tire requests that you advise it of those customers of yours, if any, who have purchased any of the tires described above for which registration forms have not previously been submitted so that such customers can be advised of the recall and the replacement of their recalled tires can be scheduled.

If you've had your tires replaced before you received this letter, you may be eligible to receive reimbursement for the cost of obtaining a pre-notification remedy of the problem associated with this recall. For more information contact the Consumer Relations Department.

We certainly apologize for any inconvenience this may cause you. If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact Cooper Tire Consumer Relations Department at (800) 854-6288.

Sincerely,

William N. G. Geaman, Jr.
Manager, Consumer Quality Systems
North American Tire Division
Cooper Tire & Rubber Company

Attachments:

ODI Cover letter & Fax Page
DNC Report – Cooper
Suggested TBC DNC Report
Tire Brand Recall Fact Sheet
Suggested Consumer Letter

TBC1590714

Suggested Dealer Letter
RIP Map
Shipping Instructions
Bill of Lading (BOL) Form
BOL Envelope
Tire and Tube Claim Form

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: MM/DD/YY

NHTSA CAMPAIGN NO.

TBC CORP NO. TBC Recall Number

1. NAME OF MANUFACTURER

- A. Fabricating Manufacturer: Cooper Tire & Rubber Company
- B. Brand Name or Trademark Owner:

BRAND NAME

OWNER

WILD COUNTRY RADIAL XTX SPORT

TBC Corporation

2. POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
265/65R18 Standard Load Tubeless Radial tires	UT 2214 – UT 2514 June 1, 2014 – June 28, 2014	XXXXXX	100%

The recall population was based on our inventory count reconciliations. The tires being recalled differ from similar items in that they were molded with a different DOT serial week and year in accordance with 49 CFR 574.5.

3. TOTAL UNITS POTENTIALLY AFFECTED: XXXX

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: 100%

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

5. **DESCRIPTION OF DEFECT OR NONCOMPLIANCE** (Including brief summary and detailed description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

We have been advised by the manufacturer that the affected tires fail to comply with the requirements of 49 CFR 571.139 S6.3 Tire Endurance; specifically S6.3.2.(a). At various distances during the specified endurance test, the subject tires may develop and exhibit cracking and broken ply cords in the lower sidewall on the intended outboard side (white sidewall side) above the rim edge.

6. **CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT** (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

Cooper Tires advised that on 6/13/14, its Texarkana Plant Tire Testing Technician noticed the anomaly on a routine surveillance tire that had been produced during DOT serial week 2214. Their initial test result was believed to be caused by a rim failure so a back-up tire was tested. On 6/25/14, the second tire failed to complete tire endurance phase of the test at 4011 kilometers. Production of the affected spec was stopped by Cooper Tire immediately and further testing initiated. The additional testing confirmed the failure.

Our inventory has been completely sorted for these tires. We received 1,492 tires from Cooper Tire & Rubber Company of which we have accounted for _____ tires in our warehouses. There were _____ tires distributed and we are voluntarily recalling these _____ tires.

7. **COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:**

The existence of the condition was determined by a review of Cooper Tire's wheel test results, visual analysis, and cut tire analysis.

8. **STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:**

Tires with the affected DOT serial week and year identification numbers should be shipped to one of our _____ (warehouse or inspection center). All tires returned to TBC Corporation will be inspected for the correct DOT identification number and all tires found to have the affected DOT serial numbers will be scrapped.

The tires located in our inventory count reconciliation will also be scrapped.

9. **ENCLOSURES, IF ANY** (Three copies of all notices, bulletins and other communications that were sent to more than one distributor, dealer or purchaser and relate directly to the defect or noncompliance):