

**RECEIVED**

By Recall Mangement Division at 10:43 am, Aug 13, 2014

**TBC CORPORATION****REVISED 8/13/14**

**To** Office of Defects Investigation "NSA-10"  
Department of Transportation  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION  
400 7th Street, S.W.  
Washington, D.C. 20590

**Phone #** 202/366-5210

**Fax #** 202/366-7882

**Re** TBC Corporation  
Recall Number 159

**Date** August 13, 2014

**Pages** 14, including this cover sheet.

Please deliver the following to:

Mr. George Person  
Recall Management Regulations.

Should there be any questions, please call me at 901-541-3695.



Tony Maddox  
V.P. Purchasing & Quality Assurance

**REVISED 8/13/14 - Please note there was an error in units secured in our warehouses on page 5 in our original fax sent 8/11/14. We have corrected this error on the attached page 5 and resending the entire fax. Thank you.**

**TBC CORPORATION**

August 11, 2014

**SENT VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Associate Administrator for Enforcement  
**NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**  
400 7th Street, S.W.  
Washington, D.C. 20590

Gentlemen:

TBC Corporation has decided that a non-compliance which relates to motor vehicle safety exists in one thousand four hundred and ninety-four (1,492) tires as set forth in the attached Defect and Noncompliance Information Report dated TBD, 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 TBD, 2013. Three copies of the appropriate notification to dealers and customers are attached as exhibits 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**  
August 11, 2014  
Page 2

Cooper Tire & Rubber Company 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,



Tony Maddox  
V.P. Purchasing & Quality Assurance

**Attachments**

cc: Office of Defects Investigation "NSA-10"  
Department of Transportation  
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION  
400 7th Street, S.W.  
Washington, D.C. 20590  
Fax Number 202/366-7882  
Attn: Mr. George Person  
Recall Management Regulations

**COOPER TIRE & RUBBER COMPANY**  
**DEFECT AND NONCOMPLIANCE INFORMATION REPORT**

DATE: August 11, 2014

NHTSA CAMPAIGN NO.

TBC CORP NO. Cooper Recall Number 159

**1. NAME OF MANUFACTURER**

A. Fabricating Manufacturer: Cooper Tire &amp; 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>
265/65R18 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 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. The existence of the condition in the subject tires may result in a reduced service life. Over time, subject tires would display signs of cracking in the lower sidewall. If left unattended, the tire could lose air and risk loss of steering control.

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 1,104 tires in our warehouses. There were 388 tires distributed and we are voluntarily recalling these 388 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 Cooper Tire inspection centers. 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 shipped to Cooper Tire and 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):

**CALL AND GET A TARA # AND THEN  
MAIL, FAX or E-MAIL  
ALL ADJUSTMENT  
PAPER WORK SEPARATELY TO:**

**COOPER TIRE  
CONSUMER RELATIONS  
SEE PAGE 1 FOR INSTRUCTIONS  
ON MAILING, FAXING or E-MAILING**



**COOPER**

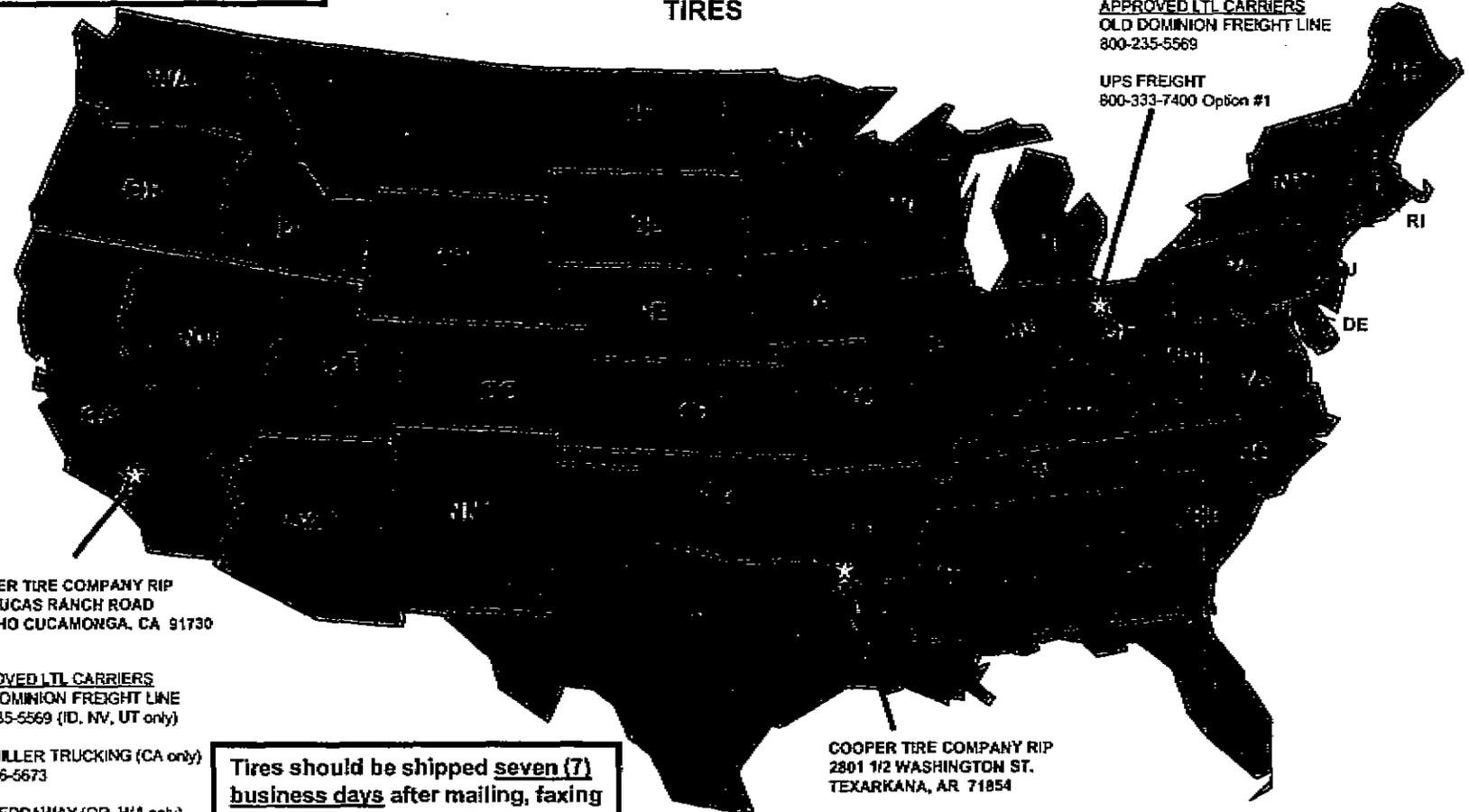
**REGIONAL INSPECTION POINTS AND  
REQUIRED CARRIERS FOR ADJUSTMENT  
TIRES**

**OVER 1000 lbs. CAN BE SENT FREIGHT  
COLLECT- CHECK SCRAP RUBBER CLASS 50**

**COOPER TIRE COMPANY RIP  
800 WESTERN AVENUE  
FINDLAY, OH 45840**

**APPROVED LTL CARRIERS  
OLD DOMINION FREIGHT LINE  
800-235-5569**

**UPS FREIGHT  
800-333-7400 Option #1**



**COOPER TIRE COMPANY RIP  
9363 LUCAS RANCH ROAD  
RANCHO CUCAMONGA, CA 91730**

**APPROVED LTL CARRIERS  
OLD DOMINION FREIGHT LINE  
(800-235-5569 (ID, NV, UT only)**

**ROY MILLER TRUCKING (CA only)  
800-336-5673**

**USF REDDAWAY (OR, WA only)  
(800) 395-1360**

**UPS FREIGHT (AZ, NM only)  
800-333-7400 Option #1**

**Tires should be shipped seven (7)  
business days after mailing, faxing  
or e-mailing in your adjustment  
paper work.**

**COOPER TIRE COMPANY RIP  
2801 1/2 WASHINGTON ST.  
TEXARKANA, AR 71854**

**APPROVED LTL CARRIERS  
OLD DOMINION FREIGHT LINE  
800-235-5569**

**YELLOW FREIGHT (WY, NE only)  
800-610-6500**



# SHIPPING INSTRUCTIONS

Adjustment tires should be listed as:

**Scrap Rubber Tires 194200 – Class 50**  
**The actual value per pound does not exceed \$1.00**

The proper listing as shown above and as shown on the **SAMPLE** Bill of Lading printed below will greatly aid in the assessment of the correct freight rate.

Our adjustment freight policy remains unchanged. You may continue to ship adjustment tires to Cooper in quantities as outlined in your 2012 adjustment procedures.

Please be sure your shipments are made – Freight Collect – to avoid billing by the freight line and/or delays in your adjustment credits.

Please contact Cooper Tire Consumer Relations Department at 800-854-6288, if you have any questions.

This bill of lading may have been printed on recycled paper. Recycled packaging material and other recycled materials are used in the production of this bill of lading.

*Refer to MAP on reverse side for shipping locations*

## STRAIGHT BILL OF LADING ORIGINAL - NOT NEGOTIABLE

Shipper No. 4164  
 Carrier No. \_\_\_\_\_  
 Date 4/20/12

TO: Consignee <b>Cooper Tire &amp; Rubber Co.</b>		(Name of Carrier)	(SCAC)
FROM: Shipper <b>ABC TIRE</b>			
Street On Collect on Delivery shipments, the letters "C.O.D." must appear before consignee's name or elsewhere provided in 49 CFR 430, Sec. 1		Street <b>2nd Street</b>	
Destination Zip Code		Origin <b>Orlando, FL</b> Zip Code <b>32805</b>	
Vehicle Number		[REDACTED]	

No. Shipping Units	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (Subject to Correction)	RATE	CHARGES
146	Scrap Rubber Tires 194200 - Class 50 The actual value per pound does not exceed \$1.00	4600	Class 50	
<b>SAMPLE</b>				
Render Freight Bill to Cooper Tire & Rubber Company, P.O. Box 550, Findlay, OH 45839				

REMIT C.O.D. TO: ADDRESS	COD Amt: \$	C.O.D. FEE: PREPAID COLLECT \$
Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per	(Signature of Consignor)	TOTAL CHARGES: \$ FREIGHT CHARGES FREIGHT PREPAID Check box if charges are to be collect COLLECT XXXX

RECEIVED, subject to the classifications and liability limit terms in effect on the date of the issue of this Bill of Lading, the property described above in sufficient good order, except as noted (contents and condition of contents of packages unknown, marked, consigned, and delivered as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.  
 Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER <b>ABC TIRE</b>	CARRIER
PER <b>John Sample</b>	PER
EMERGENCY RESPONSE TELEPHONE NUMBER	DATE

Mark with an "X" to designate Hazardous Material as defined in the Department of Transportation Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on bills of lading per 49 CFR 172.203 (b) (1) (ii) of the Federal Regulations. Also when shipping hazardous materials, the shipper's compliance statement prescribed in 49 CFR 172.204(a) of the Federal Regulations must be included on the bill of lading, unless a specific exemption from this requirement is provided in the Regulations for a particular material.



## TBC CORPORATION

### IMPORTANT SAFETY RECALL

TBD, 2014

Dear Dealer:

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

TBC Corporation and Cooper Tire & Rubber Company have decided that a non-compliance which relates to motor vehicle safety exists in all tires identified as follows:

<b>Product Name</b>	<b>Size</b>	<b>DOT Serial Number</b>	<b>Brand</b>
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 may result in a reduced service life and potentially in an early sidewall failure with unexpected rapid air loss increasing the risk of loss of vehicle steering control and may contribute or result in a vehicle crash.

Cooper Tire & Rubber Company and TBC Corporation are 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.

You should also comply with the following instructions regarding the return of new and used recall 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 TBC's claim form #35. 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 Corporation'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 TBC Claim Form #35. 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. Copies should also be mailed to TBC Corporation. 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.

TBC Corporation 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.

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 TBC Corporation Quality Assurance Department at 800-739-7698.

Sincerely,

Tony Maddox  
V.P. Purchasing & Quality Assurance

Attachments

## TBC CORPORATION IMPORTANT SAFETY RECALL

TBD, 2014

Dear Consumer:

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

TBC Corporation and Cooper Tire & Rubber Company have decided that a non-compliance which relates to motor vehicle safety exists in all tires identified as follows:

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

The following illustration shows the DOT information on a sample of the affected tires. DOT sequence begins with UTC8 T5C — and ends with a date code (2-digit week and 2-digit year) between 2214 and 2514 inclusive.



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 may result in a reduced service life and potentially in an early sidewall failure with unexpected rapid air loss increasing the risk of loss of vehicle steering control and may contribute or result in a vehicle crash.

Cooper Tire & Rubber Company and TBC Corporation are recalling all of the tires with the identification number(s) above. To ensure your safety and satisfaction with our product, we request that you return the recalled tires and this letter to your dealer. If the inspection verifies that you have a tire or tires with the suspect identification number, they will be replaced, mounted and balanced at no charge to you if you have presented them for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire is available (if not available at the time of inspection). It is expected that replacement tires will be available at the time of the 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) day period, tires will be replaced under our normal adjustment policy.

The time required to determine if the tire is subject to RECALL is only a few minutes and approximately thirty (30) minutes per tire if replacement is required.

Should any questions or problems arise while your tires are being inspected or replaced, please call the TBC Corporation Quality Assurance Department at 800-739-7698. We will attempt to be of service to you. In the event you believe we have failed to or are unable to replace your tire(s) without charge to you, within the sixty (60) day period described above, you may so notify the Secretary of Transportation at the following address: Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE, Washington, DC 20590, or phone NHTSA's Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153; or go to <http://www.safercar.gov>).

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 regret this inconvenience, but are sure that you understand our interest in your safety and satisfaction with your tires. Please see your dealer immediately for free replacement of the recalled tires. Give this letter to them so that it can be returned to us for purposes of this recall.

Sincerely,

Tony Maddox  
V.P. Purchasing & Quality Assurance

---

TO BE COMPLETED BY DEALER

Tires inspected and replaced \_\_\_\_\_  
(date)

Dealer stamp or name and address

Consumer Signature: \_\_\_\_\_

Dealer: Please complete the above section; attach letter to the Tire Claim Form #35 and return the Claim Form(s) and recalled tire(s) per our standard adjustment procedures.

# Transmission Log

Purchasing

Monday, 2014-08-11 16:59

8

Date	Time	Type	Job #	Length	Speed	Station Name/Number	Pgs	Status
2014-08-11	16:54	SCAN	01893	4:25	14400	W41-122	14	OK -- V.17 1M31

## TBC CORPORATION

To **Office of Defects Investigation "NSA-10"**  
**Department of Transportation**  
**NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION**  
 400 7th Street, S.W.  
 Washington, D.C. 20590

Phone # 202/366-5210  
 Fax # 202/366-7882

Re TBC Corporation  
 Recall Number 159

Date August 11, 2014  
 Pages 14, including this cover sheet.

Please deliver the following to:

Mr. George Person  
 Recall Management Regulations.

Should there be any questions, please call me at 901-541-3695.

*Tony Maddox*

Tony Maddox  
 V.P. Purchasing & Quality Assurance