



Daniel T. Campbell
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July 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 (2014 Q2)**

Dear Ms. Schuler:

Per 49 C.F.R. § 573.7, below please find the quarterly report for the quarter ending June 30, 2014, 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. On or about March 31, 2014, Hercules completed notification to all customers who were reachable.

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 second quarter of 2014, Hercules Tire had recovered 2,119 recalled tires, including 1,550 tires returned by consumers and dealers, and 569 tires captured prior to their first use.¹

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 not aware of any instance in which a recalled tire has not been properly disabled, has been disposed of improperly, or has been treated contrary to Hercules Tire's direction, during this reporting period.

¹ As of July 24, 2014, Hercules Tire had recovered an additional 15 tires from consumers and dealers, for a total of 2,134 recalled tires recovered.

Ms. Kelly Schuler
National Highway Traffic Safety Administration
July 30, 2014
Page 3

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

Sincerely,

A handwritten signature in blue ink that reads "DET Campbell". The signature is written in a cursive, somewhat stylized font.

Daniel T. Campbell
Rebecca B. Chaney

cc: Hercules Tire