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July 22, 2015

Via NHTSA Recall Portal and Federal Express

National Highway Traffic Safety Administration
Attn: Recall Management Division
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: Hercules Tire & Rubber Company – NHTSA ID NO. 15T011

Dear Sir or Madam:

This firm represents Hercules Tire & Rubber Company (“Hercules Tire”). This letter and the attached material supplement Hercules Tire’s report pursuant to 49 C.F.R. Part 573 submitted on July 7, 2015.

Pursuant to 49 C.F.R. 573.6(c)(10), Hercules Tire provides the attached notice that Hercules Tire sent to more than one distributor or dealer concerning this recall. (Attachment No. 1). Hercules also submits a copy of the proposed customer notification letter, along with the proposed format of the envelope in which it will be sent, for the agency’s review and approval. (Attachment No. 2). Additional notices that Hercules Tire intends to send to dealers and distributors are also provided. (Attachment Nos. 3 and 4).

The attached communications set forth further details of the recall and the instructions to dealers and distributors. Hercules anticipates that owner notification will begin in August 2015.

Please do not hesitate to contact the undersigned if you have any questions. We thank you for your attention to this matter.

Very truly yours,

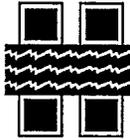


Eric L. Unis

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Attachments

Attachment 1



HERCULES TIRE USA

16380 East U.S. Route 224, Suite 200 • Findlay, OH 45840 • Office: 419.425.6400 • Fax: 419.425.6404 • www.herculestire.com

July 17, 2015

Valued Customer,

We are writing to inform you of a voluntary recall that Hercules Tire will be conducting. You are receiving this letter because our records indicate that you purchased the recalled tires. The recall affected tires are SUV sizes of the Hercules All Trac A/T line that were manufactured from June 2008 through the 21st week of 2010. Details of the recalled tires are as follows:

Product Name	Size	DOT Serial Number
Hercules ALL TRAC A/T	235/70R16 106T	JEKJEC2508-2110
Hercules ALL TRAC A/T	235/75R15 109T XL	JEKKDC2708-2110
Hercules ALL TRAC A/T	245/70R16 107T	JELJEC2508-2110
Hercules ALL TRAC A/T	255/70R16 111T	JEMJEC2508-2110
Hercules ALL TRAC A/T	265/70R16 112T	JENJEC2508-2110
Hercules ALL TRAC A/T	265/75R16 116T	JENKEC3008-2110
Hercules ALL TRAC A/T	275/70R16 114T	JERJEC1309-2110

If affected by the potential design defect, the recalled tires can experience in-service tread separation(s). Should a separation occur, the driver could lose control of the vehicle without warning.

Therefore, effective immediately, you (and your dealer customers, if applicable) must not sell any of the recall affected tires. Please quarantine the affected population of tires.

You will be receiving a formal notification of the recall from Hercules Tires in accordance with the requirements of the National Highway Traffic Safety Administration (NHTSA). This notification will outline the return, replacement and credit processes related to the recall. Consumers who may have purchased potentially affected tires will also be receiving notification of the recall.

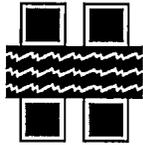
If you have questions about the recall prior to receiving the notification, you can reach our team by phone at 1-888-943-2402 or by email at alltracresponse@herculestire.com.

We are committed to working with you and your customers throughout this recall process. Your loyalty as a Hercules Tire dealer is of the utmost importance to us. As always, thank you for your business.

Sincerely,

Hercules Tire & Rubber Company

Attachment 2



HERCULES TIRE USA

16380 East U.S. Route 224, Suite 200 • Findlay, OH 45840 • Office: 419.425.6400 • Fax: 419.425.6404 • www.herculestire.com

IMPORTANT SAFETY RECALL

August __, 2015

Re: Hercules Tire Recall #01-2015

Dear Customer,

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

Hercules Tire has decided that a defect which relates to motor vehicle safety exists in SUV tires identified as follows:

Product Name	Size	DOT Serial Number Range	Owner
Hercules ALL TRAC A/T	235/70R16 106T	JEKJEC2508-2110	Hercules
Hercules ALL TRAC A/T	235/75R15 109T XL	JEKKDC2708-2110	Hercules
Hercules ALL TRAC A/T	245/70R16 107T	JELJEC2508-2110	Hercules
Hercules ALL TRAC A/T	255/70R16 111T	JEMJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/70R16 112T	JENJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/75R16 116T	JENKEC3008-2110	Hercules
Hercules ALL TRAC A/T	275/70R16 114T	JERJEC1309-2110	Hercules

Hercules Tire has determined that the tires described above, if affected by the defect, can experience in-service tread separations. Should a separation occur in your tire you could lose control of the vehicle without warning, which could possibly result in a vehicle crash.

As a result, Hercules Tire is voluntarily recalling all tires within the size and serial number ranges shown above. To ensure your safety and satisfaction with our product, we request that you return any recalled tires and this letter to your Hercules Tires dealer as soon as possible. If the dealer's inspection verifies that you have a tire or tires within the affected range, the tire or tires will be replaced, mounted and, if needed, balanced at no charge to you, as long as 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 and if Hercules replacement tires are not available at the time of inspection, they will be replaced by another comparable tire brand using the same size and load rating as required by the vehicle manufacturer. After expiration of the sixty (60) day period, tires will be replaced at a pro-rated value determined by remaining tread depth.

It will take just a few minutes to determine if your tire(s) is subject to the recall and approximately thirty (30) minutes per tire if replacement is required. The replacement will be performed at no cost to you.

Should you have any questions now, or if any questions or problems arise while your tires are being inspected or replaced, please contact the Hercules recall service center at 1-888-943-2402. 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 had your tires replaced before you received this letter due to the issue described above, you may be eligible to receive reimbursement for the reasonable cost of obtaining a pre-notification remedy of the problem associated with this recall. For more information, contact our recall service center at 1-888-943-2402.

We regret this inconvenience. We at Hercules Tire are committed to the highest standards of safety and product quality, and our interest is in your safety and satisfaction with your tires. Please bring this letter to your dealer immediately for free replacement of any recalled tires. Thank you.

Sincerely,

Quality Assurance
Hercules Tire & Rubber Company

TO BE COMPLETED BY DEALER

_____ tires inspected and replaced _____
Number Date

Dealer stamp or name and address

Attention Dealer: The customer received this notification letter in connection with a recall Hercules Tire is currently conducting for the following SUV tires in the Hercules All Trac A/T line:

Product Name	Size	DOT Serial Number	Owner
Hercules ALL TRAC A/T	235/70R16 106T	JEKJEC2508-2110	Hercules
Hercules ALL TRAC A/T	235/75R15 109T XL	JEKKDC2708-2110	Hercules
Hercules ALL TRAC A/T	245/70R16 107T	JELJEC2508-2110	Hercules
Hercules ALL TRAC A/T	255/70R16 111T	JEMJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/70R16 112T	JENJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/75R16 116T	JENKEC3008-2110	Hercules
Hercules ALL TRAC A/T	275/70R16 114T	JERJEC1309-2110	Hercules

When a consumer presents a recalled tire to you for replacement, you must first visually inspect each tire to confirm that it is covered by the recall. If the consumer's tire(s) is covered by this recall, you should replace the tire(s), mount the new tire(s) and, if needed, balance the tire(s). Recalled tires should be replaced with a comparable Hercules brand tire using the same size and load rating as required by the vehicle manufacturer. If Hercules brand tires are not available at the time of the inspection, recalled tires should be replaced with a comparable tire brand. Hercules Tire will authorize a labor allowance of \$15.00 per tire.

Recalled tires should be replaced at no cost to the consumer if they are presented for remedy within sixty (60) days after (i) receipt of a recall notification-letter-or (ii) notice that a replacement tire is available, if not available at the time of inspection. After 60 days, tires will be replaced at a pro-rated value determined by remaining tread depth. If a consumer wishes to purchase a higher-priced replacement tire, he or she may pay the difference in cost between the consumer's desired tire and the replacement tire offered.

Recalled tires must be disabled by making a 3-inch-long cut in each sidewall of the tire.

For additional information about the recall, including recommended replacement tires, the maximum replacement allowance, and how to receive a credit for tire and labor costs associated with replacing the customer's tire, please call Hercules Tire at 1-888-943-2402.

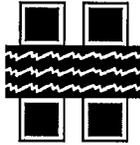
Hercules Tire & Rubber Company
16380 East U.S. Route 224
Suite 200
Findlay, Ohio 45840

SAFETY RECALL NOTICE

[Tire Customer]
123 Main Street
Washington, DC 20004

**NHTSA
Mandatory
Recall Label**

Attachment 3



HERCULES TIRE USA

16380 East U.S. Route 224, Suite 200 • Findley, OH 45840 • Office: 419.425.6400 • Fax: 419.425.6404 • www.herculestire.com

August __, 2015

Re: Hercules Tire Recall #01-2015

Dear Hercules Tire Dealer,

Hercules Tire, in conjunction with the National Highway Traffic Safety Administration (“NHTSA”), is conducting a voluntary safety recall of several SUV sizes of the Hercules All Trac A/T tire line. As a tire dealer who our records indicate has sold tires covered by this recall, you are receiving this letter to (1) help you easily and accurately identify any recalled product, (2) outline your critical role in the recall, (3) walk you through the replacement, return and reimbursement processes, and (4) provide you with information on resources that can help you follow the recall requirements.

Hercules Tire has decided that a defect that relates to motor vehicle safety may exist in several SUV sizes of the Hercules All Trac A/T tire that were manufactured from June 2008 through the 21st week of 2010.

We have determined that the tires in the range described below can, if affected by the issue, experience in-service tread separations. Should a separation occur, vehicle operators could lose control of their vehicles without warning, which could possibly result in a vehicle crash.

Details of the recalled tires are as follows:

Product Name	Size	DOT Serial Number	Owner
Hercules ALL TRAC A/T	235/70R16 106T	JEKJEC2508-2110	Hercules
Hercules ALL TRAC A/T	235/75R15 109T XL	JEKDCP2708-2110	Hercules
Hercules ALL TRAC A/T	245/70R16 107T	JELJEC2508-2110	Hercules
Hercules ALL TRAC A/T	255/70R16 111T	JEMJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/70R16 112T	JENJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/75R16 116T	JENKECP3008-2110	Hercules
Hercules ALL TRAC A/T	275/70R16 114T	JERJEC1309-2110	Hercules

Immediate Next Steps

To begin the recall process, you must locate and quarantine all recalled All Trac A/T tires in your inventory. It is imperative that you and your sub-dealers, if applicable, do not sell any of these tires. Please note that it is a violation of federal law to sell or lease new or used tires covered by this notification.

We also need your assistance to locate all end users and sub-dealers, if applicable, who may have purchased recalled tires, so we can attempt to notify them of this recall. Due to the urgency and importance of this notification, please send to Hercules Tire as soon as possible – but no later than September 30, 2015 – the names and addresses of all consumers and sub-dealers to whom you sold or for whom you serviced the recalled tires. As soon as you provide that information, Hercules Tire will mail the enclosed consumer recall notification letter to your consumer customers and/or a letter similar to this to any sub-dealer customers. Naturally, if you wish to write, call or email your customers in addition to Hercules Tire’s mailing, we encourage you to do so.

Please e-mail the list of all customers who may have purchased recalled tires to alltracresponse@herculestire.com, fax it to 1-877-650-7690, or call 1-888-943-2402 to provide it via telephone. Please separate consumer and sub-dealer lists, if applicable.

We also ask that you share the information contained in this letter with all employees who are involved with the removal handling or return of recalled tires to ensure that they are aware of the procedures and requirements described in this letter. A failure to comply with the instructions of this letter may constitute a violation of the National Traffic and Motor Vehicle Safety Act.

Replacing Consumer Tires

Consumers will be advised to return their recalled tire(s) and the recall notification letter they received, if available, to a Hercules Tires dealer. When a consumer presents a recalled tire to you for replacement, please visually inspect each tire and its serial number to confirm that it is covered by the recall. If the consumer's tire(s) is covered by this recall, you should replace the tire(s), mount the new tire(s) and, if needed, balance the tire(s). Hercules Tire will authorize a labor allowance of \$15.00 per tire. We have advised the consumer that it will take approximately thirty (30) minutes to replace each recalled tire.

Recalled tires should be replaced with a comparable Hercules brand tire using the same size and load rating as required by the vehicle manufacturer. If Hercules brand tires are not available at the time of the inspection, please replace the recalled tires with a comparable tire brand. PLEASE NOTE: The Hercules Terra Trac AT II tire is the recommended replacement tire. The maximum allowable reimbursement credit for a comparable tire brand is up to \$600.00 on four, or \$150.00 per replacement. If a consumer wishes to purchase higher-priced replacement tires, he or she may pay the difference in cost between the consumer's desired tire and the replacement tire offered.

Recalled tires should be replaced at no cost to the consumer if they are presented for remedy within sixty (60) days after (i) receipt of a recall notification letter or (ii) notice that a replacement tire is available, if not available at the time of inspection. After 60 days, recalled tires will be replaced at a pro-rated value determined by remaining tread depth.

Collecting Recalled Tires from Sub-Dealers (if applicable)

If you have sold recalled tires to any sub-dealer, please collect those recalled tires. Also, as soon as possible, please provide Hercules Tire with the names and addresses of all sub-dealers to whom you sold recalled tires.

You can e-mail this information to alltracresponse@herculestire.com, fax it to 1-877-650-7690, or call 1-888-943-2402 to provide it via telephone.

Handling Recalled Tires

As mentioned above, all tires covered by the recall must be quarantined. This applies to new tires in your inventory, and tires removed from consumer vehicles and tires collected from your sub-dealers. Please take the following actions for **each** tire collected or covered under this recall: (1) write "Recall" in tire crayon on the sidewall of the tire, and (2) **disable** the tire by making a 3-inch-long cut in each sidewall of the tire. This cut must be at least 3 inches to ensure that the tire cannot be inflated. **Do not skive DOT serial week codes on recalled tires.**

Please note that federal law requires that if recalled tires are removed from a consumer's vehicle and not altered in accordance with these instructions, you must notify Hercules Tire within 30 days of their removal, and explain why they were not properly altered.

Disposing of Recalled Tires

Please do not independently dispose of the recalled tires. We will handle disposal of all recalled tires. After replacing and/or collecting recalled tires, contact your Hercules wholesale distributor (ATD branch or independent wholesaler) to arrange for the tires to be returned. The recalled product can be picked up upon the next product delivery or you may drop it off at the wholesale location. Along with the recalled tires, please provide the invoice for labor charges and the consumer's recall notification letter, if available.

Please note that if recalled tires are not returned to your Hercules wholesale distributor in accordance with these instructions within 30 days of your receipt of the recalled tires, you must notify Hercules Tire, and explain why the recalled tires were not returned within that time.

Credit for Recalled Tires

As mentioned above, when returning recalled tires, please include a copy of the invoice for labor charges, and the consumer's recall notification letter, if available. This information will allow Hercules tire to credit you for labor charges, as well as the charges for the replacement tires. Note that the Hercules wholesale distributor will initially bill you for replacement tires, but upon verification that returned tires are within the recall population, Hercules Tire will issue a credit to your wholesale distributor for you, based upon your last invoice price of the replacement tires (up to \$600.00 on four, or up to \$150.00 per replacement for a brand other than Hercules Tires). Hercules Tire will authorize a labor allowance of \$15.00 per tire.

In the event a recalled tire is sold, you must immediately notify the National Highway Traffic Safety Administration of the sale. Such reports should be made to the Associate Administrator for Enforcement, NHTSA, 1200 New Jersey Avenue, S.E., Washington, DC 20590.

For Further Information

We have a dedicated team in place to field questions and calls associated with the recall. The team can be reached by phone at 1-888-943-2402, by fax at 1-877-650-7690 and by email at alltracresponse@heculestire.com.

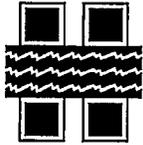
Thank you in advance for your assistance. It is our desire to make this recall process consistent with the high level of service and quality you have come to expect from Hercules Tire. We are committed to working with you and your customers throughout this recall to ensure a successful campaign. As always, thank you for your business.

Sincerely,

Quality Assurance
Hercules Tire & Rubber Company

Enclosures:
Customer Recall Letter

Attachment 4



HERCULES TIRE USA

16380 East U.S. Route 224, Suite 200 • Findlay, OH 45840 • Office: 419.425.6400 • Fax: 419.425.6404 • www.herculestire.com

August __, 2015

Re: Hercules Tire Recall #01-2015

Dear Hercules Distributor,

Hercules Tire, in conjunction with the National Highway Traffic Safety Administration (“NHTSA”), is conducting a voluntary safety recall of several SUV sizes of the Hercules All Trac A/T tire line. You are receiving this letter to (1) help you easily and accurately identify any recalled product, (2) outline your critical role in the recall, (3) walk you through the replacement, return and reimbursement processes, and (4) provide you with information on resources that can help you follow the recall requirements.

Hercules Tire has decided that a defect that relates to motor vehicle safety may exist in several SUV sizes of the Hercules All Trac A/T tire that were manufactured from June 2008 through the 21st week of 2010.

We have determined that the tires in the range described below, if affected by the issue, can experience in-service tread separations. Should a separation occur, vehicle operators could lose control of their vehicles without warning.

Details of the recalled tires are as follows:

Product Name	Size	DOT Serial Number	Owner
Hercules ALL TRAC A/T	235/70R16 106T	JEKJEC2508-2110	Hercules
Hercules ALL TRAC A/T	235/75R15 109T XL	JEKKDC2708-2110	Hercules
Hercules ALL TRAC A/T	245/70R16 107T	JELJEC2508-2110	Hercules
Hercules ALL TRAC A/T	255/70R16 111T	JEMJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/70R16 112T	JENJEC2508-2110	Hercules
Hercules ALL TRAC A/T	265/75R16 116T	JENKEC3008-2110	Hercules
Hercules ALL TRAC A/T	275/70R16 114T	JERJEC1309-2110	Hercules

Immediate Next Steps

To begin the recall process, you must locate and quarantine all recalled All Trac A/T tires in your new product inventory. It is imperative that you and your customers do not sell any of these tires. Please note that it is a violation of federal law to sell or lease new or used tires covered by this notification.

We also need your assistance to locate all dealer customers or end users who may have purchased recalled tires, so we can attempt to notify them of this recall. Due to the urgency and importance of this notification, please send to Hercules Tire as soon as possible – but no later than September 30, 2015 – the names and addresses of all dealers and consumers, if applicable, to whom you sold or for whom you serviced the recalled tires. As soon as you provide that information, Hercules Tire will mail a letter similar to this to any dealer customers and/or the enclosed consumer recall

notification letter to any consumer customers. Naturally, if you wish to write, call or email your customers in addition to Hercules Tire's mailing, we encourage you to do so.

Please e-mail the list of all dealer and/or consumer customers who may have purchased recalled tires to alltracresponse@herculestire.com, fax it to 1-877-650-7690, or call 1-888-943-2402 to provide it via telephone. Please separate consumer and dealer lists, if applicable.

We also ask that you share the information contained in this letter with all employees who are involved with the removal, handling or return of recalled tires to ensure that they are aware of the procedures and requirements described in this letter. A failure to comply with the instructions of this letter may constitute a violation of the National Traffic and Motor Vehicle Safety Act.

Recalled Tires in Your Inventory

It is imperative that you quarantine all recalled tires in your inventory. Please write "Recall" in tire crayon on the sidewall of each tire. Also, you **must disable** all tires covered by this recall. To disable, make a 3-inch-long cut in each sidewall of the tire. This cut must be at least 3 inches to ensure that the tire cannot be inflated. **Do not skive DOT serial week codes on recalled tires.**

Replacing and Collecting Recalled Tires

Consumers have been advised to return their recalled tire(s) and the recall notification letter they received, if available, to their local Hercules Tire dealer. After confirming that the consumer's tire(s) is covered by the recall, a Hercules Tire dealer will replace the recalled tire(s). Recalled tires should be replaced with a comparable Hercules brand tire using the same size and load rating as required by the vehicle manufacturer. If Hercules brand tires are not available at the time of the inspection, dealers have been advised to replace the recalled tires with a comparable tire brand. PLEASE NOTE: The Hercules Terra Trac AT II tire is the recommended replacement tire. The maximum allowable reimbursement credit for a comparable tire brand is up to \$600.00 on four, or \$150.00 per replacement (excluding labor). If a consumer wishes to purchase higher-priced replacement tires, he or she may pay the difference in cost between the consumer's desired tire and the replacement tire offered.

The dealer should then contact you. Please arrange for the prompt collection and return of the recalled tires at no cost to the consumer. Along with the recalled tire(s), the tire dealer should return to you the customer's invoice for labor charges, and the consumer's recall notification letter, if available.

Handling Recalled Tires

Please confirm that returned tires are covered by the recall. Like the recalled tires in your inventory, recalled tires returned to you must be quarantined. Upon receipt of returned recalled tires, you must confirm that the tires are labeled "Recall" in tire crayon on the sidewall of each tire. You must also confirm that the tires have been disabled, as described above. If a tire has not been properly altered, alter it immediately in accordance with the above instructions.

Please note that federal law requires that if recalled tires are removed from a consumer's vehicle and not altered in accordance with these instructions, you must notify Hercules Tire within 30

days of their removal, and explain why they were not properly altered.

Disposing of Recalled Tires

Please do not independently dispose of the recalled tires. Recalled tires in your new product inventory, and those returned to you from Hercules Tire dealers, must be returned to Hercules Tire. After replacing and/or collecting recalled tires, contact your Hercules Tire product adjustment representative to arrange for recalled tires to be returned to the appropriate Hercules warehouse. Your adjustment representative will work with you to determine the best method to return the tires at no cost to you. Along with the tires, please be prepared to provide copies of the following: (1) customer's invoice for labor charges; (2) consumer's recall notification letter (if available); and (3) a completed claim form.

Credit for Recalled Tires

As mentioned above, when returning recalled tires, please include a copy of the invoice for labor charges, and the consumer's recall notification letter, if available. This information will allow Hercules Tire to issue a credit for your customer's labor charges, as well as the charges for the replacement tires. Hercules Tire will authorize a labor allowance of \$15.00 per tire. For recalled tires removed from your inventory, Hercules Tire will issue a credit to you based upon your last invoice price of the tires. Please remember that the maximum allowable reimbursement credit for a comparable tire brand is up to \$600.00 on four, or \$150.00 per replacement (excluding labor).

In the event a recalled tire is sold, you must immediately notify the National Highway Traffic Safety Administration of the sale. Such reports should be made to the Associate Administrator for Enforcement, NHTSA, 1200 New Jersey Avenue, S.E., Washington, DC 20590.

For Further Information

We have a dedicated team in place to field questions and calls associated with the recall. The team can be reached by phone at 1-888-943-2402, by fax at 1-877-650-7690 and by email at alltracresponse@heculestire.com.

Thank you in advance for your assistance. It is our desire to make this recall process consistent with the high level of service and quality you have come to expect from Hercules Tire. We are committed to working with you and your customers throughout this recall to ensure a successful campaign. As always, thank you for your business.

Sincerely,

Quality Assurance
Hercules Tire & Rubber Company

Enclosures:

Customer Recall Letter