

Hercules Tire & Rubber Company 15T-011

August 20, 2015

49 CFR 573.6(c)(6) Amended Chronology

As noted in the Description of Defect, in the course of responding to NHTSA's Information Request in EQ15-001, Hercules learned of certain similarities between its tires and the tires that ITG Voma recalled. The manufacturer, Yongsheng, made the same change in production, installing a complete nylon cap as opposed to a partial nylon cap, at the same time during the manufacture of Hercules tires as it did with respect to the ITG Voma SUV tires. Out of an abundance of caution, Hercules filed a Part 573 Defect Report and is recalling its SUV tires manufactured by Yongsheng that were manufactured without a full nylon cap.

Hercules imported and sold approximately 90,000 of the recalled tires manufactured by Yongsheng between June 2008 and May 2010.

On or about March 12, 2015, Hercules received an Information Request in connection with EQ15-001, which was opened to "investigate allegations that certain Hercules All Trac A/T tires are substantially similar in design, construction, and performance as tires ITG Voma recalled due to a safety defect and therefore Hercules should make a defect decision and recall its All Trac A/T tires."

On or about May 22, 2015, Hercules received from Crown Tyre, the entity from which it purchased the tires manufactured by Yongsheng that were the subject of EQ15-001, a cured tire specification and design history. This history indicates that, in May 2010, Yongsheng made the same cap modification to some of Hercules' tires as had been made to the recalled ITG Voma tires. Hercules provided these documents to NHTSA on May 29, 2015.

On or about June 12, 2015, Hercules received from Crown Tyre, the green tire specifications for the tires. Hercules provided these documents to NHTSA on June 16, 2015. Hercules does not have any independent basis on which to determine whether its tires have the exact same green tire specifications as the recalled ITG Voma SUV tires.

Hercules did not base its decision to recall on adjustment data or field reports. In fact, that information indicates the absence of a defect. Hercules' adjustment data does not indicate higher than usual adjustment rates for these tires, or any unusual spikes in the adjustment rates. Hercules re-examined the adjustment data and field reports concerning the tires in or about October 2014, after ITG Voma commenced its recall.

Hercules believes that it received a maximum of five reports of property damage related to possible tread separation since 2009 involving the tires now under recall. Hercules received these reports on July 13, 2010, December 20, 2012, April 12, 2013, May 16, 2013, and August 27, 2013. The reports received on July 13, 2010 and April 12, 2013 do not indicate the tires' DOT numbers so it is not certain that all of these tires were among those under recall.