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12T-009
(4 pages)

11 April 2012

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division NVS-215
1200 New Jersey Avenue, SE.,
Washington, DC 20590

Attn : Ms. Nancy L. Lewis
NHTSA NVS-200

Dear Ms. Lewis,

Following up on my phone message to Mr. Claude Harris of 11 April 2012, attached find our Part 573 Report concerning the Michelin XZU2, XZU3, and XM505 tires. In the coming days, I will follow up with the draft of MNA's owner notification letter. For questions, my contact information is listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Emerson", written over a light blue horizontal line.

John R. Emerson
Director, Industry Standards & Government Regulations
Michelin North America, Inc
515 Michelin Road
Post Office Box 1987
Greenville, SC 29602-1987
Phone: 864-422-4708

Michelin Americas Research Company

515 Michelin Road, P.O. Box 1987
Greenville, South Carolina 29605-1987



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Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division NVS-215
1200 New Jersey Avenue, SE.,
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Re: Part 573 Defect Information Report

Pursuant to the requirements of 49 C.F.R. Part 573, Michelin North America (MNA) submits the following report related to certain tires manufactured under Federal Motor Vehicle Safety Standards FMVSS119 (New Pneumatic Tires for Motor Vehicles with a GVWR of more than 4,536 kgs (10,000 lbs)).

Pursuant to 49 C.F.R. § 573, MNA reports the following :

573.6(c)(1) Name of Manufacturer:

Michelin North America, Inc.

573.6(c)(2)(iii) Items Potentially Containing the Defect:

The tires involved can be identified as follows –

- 305/85R22.5 Michelin XZU3 LRJ containing DOT TIN –
B6KUR6AX and of DOT date range 4305 thru 3511.
- 12R22.5 Michelin XZU2 LRJ containing DOT TIN –
B63XB3KX and of DOT date range 4305 thru 3511.
- 305/85R22.5 Michelin XM505 LRJ containing DOT TIN -
B6KU001X and of DOT date range 1610 thru 1810, and 0411 thru 0611.

Michelin North America, Inc.
Industry Standards & Government Regulations
515 Michelin Road
Post Office Box 1987
Greenville, SC 29602-1987

Re: Part 573 Defect Information Report

573.6(c)(3) Total Number of Tires Potentially Containing the Defect:

Approximately 77,775 tires produced in our Spartanburg, SC plant are involved.

305/85R22.5 XZU3 LR J

Quantity : 48,755 produced
45,763 sold in US market (OE - 6,545; Replacement - 39,218)
2992 sold in Canadian market (OE - 52; Replacement - 2940)

12R22.5 XZU2 LR J

Quantity: 28,529 produced
27,441 sold in US market (OE - 3,472; Replacement - 23,969)
1088 sold in Canadian market (OE - 0; Replacement - 1088)

305/85R22.5 XM505 LR J

Quantity: 491 produced
441 sold in US market (OE - 0; Replacement - 441)
50 sold in Canadian market (OE - 0; Replacement - 50)

573.6 (c)(4) Percentage of Tires Estimated to Actually Exhibit the Defect:

Up to 100% of the approximately 77,775 tires released to the market described above could be affected during service as a retread. However, only 0.25% of the population described has exhibited the performance issue to date.

573.6(c)(5) Description of the Defect

Retreaded tire casings of the DOT date ranges identified have the possibility of experiencing a loss of casing integrity and, in some cases, rapid air loss, presenting a risk to motor vehicle safety.

573.6(c)(6) Basis For Determination of the Defect:

In the 2010 and 2011 timeframe, an increasing rate of retreaded casing endurance issues (rapid air loss) for in-service tires was identified by lease fleet customers. These reports prompted a review of fleet maintenance practices by field engineers, resulting in a maintenance practice review and retraining program for the impacted customers which resolved their issues.

In parallel, Michelin's ongoing program of continuous improvement produced numerous design and process updates that targeted various performances, including casing life. The casing design characteristics following the continuous improvement updates as of week 36 of 2011 exhibit the properties of the previous robust populations. Similar incidents at other fleets in the first quarter of 2012 did not respond to the same maintenance practice review and training, leading to a more detailed investigation and ultimate determination to conduct a voluntary recall.

Re: Part 573 Defect Information Report

Further, MNA received one personal injury claim related to the subject tires. The subject tires are typically used in transit bus applications.

573.6(c)(8) Remedy Program:

MNA will initiate a voluntary safety recall of the subject tires. The customers that may have purchased new or retreaded tires of the specified date ranges will be contacted by first class mail beginning the week of April 30, 2012. This correspondence will explain the issue, and include specific instructions as to how to obtain similar replacement products, as well as procedures for collecting reimbursement for remedies made prior to the recall, where appropriate.

All tires in the specified DOT date ranges removed from service, or in our possession, will be scrapped.

573.6(c)(9) Disposition of Recalled Tires

In accordance with the provisions of 49 CFR Part 573.6(c)(9)(i-iii), MNA will make dealers and retread shops aware of the requirements that become effective in connection with the disposition of all recalled tires through a Dealer Notification letter that will be submitted to the agency separately pursuant to 49 CFR Part 573.6(c)(10). The program for disposing of all recalled tires returned to MNA will comply with applicable state and local law regarding the disposal of tires, and to the extent possible, will be channeled into a category of positive reuse or beneficial non-vehicular reuse.

573.6(c)(10) Owner Notification

A draft of MNA's owner notification letter will be forthcoming.

Sincerely,



John R. Emerson
Director, Industry Standards & Government Regulations
Michelin North America, Inc