



July 31, 2018

**VIA FEDERAL EXPRESS**

Administrator for Enforcement  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: 49 CFR Part 556 – Petition for Exemption for Inconsequential Noncompliance  
NHTSA ID: 18T010  
Transaction ID: 18-001515-20978-10

Applicant: Yokohama Tire Corporation  
1 MacArthur Place  
Santa Ana, CA 92707

Dear Administrator,

Yokohama Tire Corporation ("YTC"), a corporation of the State of California with its principal address at 1 MacArthur Place, Santa Ana, California 92707 hereby petitions pursuant to Part 556 of Title 49 Code of Federal Regulations for exemption from the National Traffic and Motor Vehicle Safety Act's notification and remedy requirements with respect to the following identified commercial truck tires.

**Background:**

This Petition concerns Yokohama 11R22.5 16PR RY023 commercial truck and bus replacement tires whose branding information incorrectly states the Ply Rating, Load Range and Load Capacity on one side (serial side) only, while the branding information on the other side (opposite serial side) is correct for the subject tires. These tires were manufactured by Yokohama Tire Manufacturing Mississippi (YTMM), 1 Yokohama Boulevard, West Point, Mississippi, in one mold between the 4<sup>th</sup> week of 2018 through the 19<sup>th</sup> week of 2018.

**Tires Involved in this Petition:**

**11R22.5 16PR RY023**

Manufactured with serial side lettering:

14 PR LOAD RANGE G

MAX. LOAD SINGLE 2800 kg (6175 lbs) at 720 kPa (105 psi) COLD

MAX. LOAD DUAL 2650 kg (5840 lbs) at 720 kPa (105 psi) COLD

The correct serial side lettering should read:

16 PR LOAD RANGE H

MAX. LOAD SINGLE 3000 kg (6610 lbs) at 830 kPa (120 psi) COLD

MAX. LOAD DUAL 2725 kg (6005 lbs) at 830 kPa (120 psi) COLD

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The opposite serial side was manufactured with correct lettering:

16 PR LOAD RANGE H

MAX. LOAD SINGLE 3000 kg (6610 lbs) at 830 kPa (120 psi) COLD

MAX. LOAD DUAL 2725 kg (6005 lbs) at 830 kPa (120 psi) COLD

Because of this mold branding error, these tires are not in compliance with the tire labeling requirement found in 49 CFR §571.119 S6.5(f) and (j), even though all of these tires were manufactured with the correct ply rating and load range.

SIZE	TIN: Week/Year	Total Production	Contained	Sold
<b>11R22.5 16PR RY023</b>	0418 -1918	1659	764	895

The issue arose at a scheduled mold changeover, as one of the two mold plugs was not removed when changing from 14PR to 16PR tires. Upon notification of this branding issue by YTC Field Service, YTMM implemented verification countermeasures to prevent any recurrence of any incorrect tire markings. Further investigation determined that the suspect period ended when the incorrect mold had been removed from production on May 17, 2018, in the 19<sup>th</sup> production week of 2018. The 764 tires in containment will be repaired before they are sold.

#### **Analysis of Petition:**

Yokohama believes this noncompliance is inconsequential to motor vehicle safety. Significantly, these tires were manufactured as designed and meet or exceed all applicable Federal Motor Vehicle Safety performance standards. While the sidewall markings are correct on the Opposite Serial Side, the sidewall markings on the Serial Side understate the construction and capacity of the subject RY023. The mis-branding of these tires is not a safety concern and also has no impact on the retreading, repairing and recycling industries. The affected tire mold has already been corrected and all future production will have the correct material shown on the sidewall.

NHTSA has studied the impact of tire labeling information on safety in the context of its rule making efforts under the Transportation Recall Enhancement, Accountability and Documentation (TREAD) Act. NHTSA's analysis concluded that tire construction information on a tire's sidewall is not relied upon by dealers and consumers in the selling or purchase of tires and has an inconsequential impact on



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motor vehicle safety. Accordingly, NHTSA has previously granted Petitions for similar noncompliance conditions as presented here by Yokohama. (For example, see Sumitomo Rubber Industries Grant of Petition for Decision of Inconsequential Noncompliance, 83 Fed. Reg. 13002 (March 26, 2018); and Goodyear Tire & Rubber Co. Grant of Petition for Decision for Inconsequential Noncompliance, 81 Fed. Reg. 18210 (April 17, 2017).

**Conclusion:**

Yokohama Tire Corporation respectfully requests the Administrator, under authority of 49 CFR 556 and 49 USC 30118(d) and 30120(h), to exempt Yokohama from the requirements of giving notice and remedy. We submit that the noncompliance with 49 CFR §571.119 S6.5(f) and (j) is inconsequential as it relates to motor vehicle safety.

As required by 49 CFR §556.4, this Petition is being submitted in triplicate, with three copies of the Attachment A, Defect / Noncompliance Tire Report, Transaction ID: 18-001515-20978-10, previously submitted by YTC.

**Corporate official, by name and title, whom the agency should contact with respect to this request.**

**Name & Title:** Ronald T. Steranko  
Manager, Corporate Quality Assurance

**Office Phone:** (800) 423-4544 x4813

**Cell Phone:** (980) 434-3386

**Email:** [ronald.steranko@yokohamatire.com](mailto:ronald.steranko@yokohamatire.com)

Respectfully submitted,

**YOKOHAMA TIRE CORPORATION**

Ronald T. Steranko  
Manager, Corporate Quality Assurance



Yokohama Tire Corporation

### Tire Report

NHTSA ID: 18T010 Transaction ID: 18-001515-20978-10 (Original Report)

Required fields indicated with \*

<b>Manufacturer: Yokohama Tire Corporation</b>	
1 MacArthur Place Santa Ana CA 92707	Ronald Steranko Manager Corp Quality Assurance (800) 423-4544,

This is a Noncompliance Report. Filing a petition pursuant to 49 CFR 556

Tire Information					
<b>YOKOHAMA RY023 11R22.5 16(LR H) 146/143L</b>					
* Tire Brand:	YOKOHAMA		<b>Descriptive Information:</b>		
* Tire Line:	RY023		One sidewall shows incorrect load rating markings. The correct Branding is: "16 PR LOAD RANGE H MAX. LOAD SINGLE 3000 kg (6610 lbs) AT 830 kPa (120 psi) COLD MAX. LOAD DUAL 2725 kg (6005 lbs) AT 830 kPa (120 psi) COLD", but the Serial Side shows: "14 PR LOAD RANGE G MAX. LOAD SINGLE 2800 kg (6175 lbs) AT 720 kPa (105 psi) COLD MAX. LOAD DUAL 2650 kg (5840 lbs) AT 720 kPa (105 psi) COLD"		
* Tire Size:	11R22.5 16(LR H) 146/143L				
<b>Production Dates</b>	Begin:	02/02/2018			
	End:	05/17/2018			
<i>Tire Identification Number (TIN)</i>					
* Plant ID code:	* Size code:	Optional code:	* Beg. Date Code:	* End. Date Code:	FA
3T	JAE	0418	1918		

Number potentially involved: 4704 Estimated percentage of involved with defect: 19%

Defect / Noncompliance Description	
For this Defect/Noncompliance:	
<p><b>* Describe the defect or noncompliance:</b> During the manufacturing period, 1659 tires were manufactured at Yokohama Tire Manufacturing Mississippi, West Point, MS, in one mold with an incorrect Ply Rating / Load Range on one side (serial side). The correct Load Rating is 16 PR LOAD RANGE H, but the Serial Side shows 14 PR LOAD RANGE G</p> <p><b>If a noncompliance, provide the applicable FMVSS:</b> 119 - New pneumatic tires- other than passenger cars</p> <p><b>If applicable, provide any further FMVSS affected:</b></p> <p><b>Describe the cause:</b> At a scheduled mold changeover, one of the two mold plugs was not removed, when changing from 14PR tires to 16PR tires.</p>	<p><b>* Describe the safety risk:</b> Yokohama Tire Corporation intends to file a Petition for Exemption from the Notification and Remedy requirements of the Motor Vehicle Safety Act on the grounds that this noncompliance is inconsequential as it relates to motor safety. All of the noncompliant tires that are the subject of this information report have successfully met all other provisions and test criteria of 49 CFR, Ch. V, Section 571.119, New pneumatic tires for motor vehicles with a GVWR of more than 4,536 kilograms (10,000 pounds) and motorcycles</p> <p><b>Identify any warning which can precede or occur:</b> There is no relevant warning which can precede or occur.</p>
<b>This Recall affects all vehicles.</b>	
If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.	
Component manufacturer	Company Contact Information
Company Information	
<b>Company Name:</b>	<b>First Name:</b>
<b>Country:</b>	<b>Last Name:</b>
<b>Address 1:</b>	<b>Position:</b>
<b>Address 2:</b>	<b>Email:</b>
<b>City:</b>	<b>Phone:</b>
<b>State:</b>	
<b>Zip/Postal Code:</b>	

#### Purchaser Information

Chronology of Defect / Noncompliance Determination
Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:



The inconsistent branding was noticed by a Yokohama dealer, and reported to YTC Field Service. Field Service confirmed the condition on the reported tire and notified the manufacturing facility and Corporate QA, who placed all warehouse quantities of this tire line on hold. Physical sorting of warehouse stock indicated that the anomaly was limited to a single mold (Mold No. 21, one of ten used during the suspect production period) during the specified time period. 895 tires were manufactured and sold.

#### Identify the Remedy

**Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.**

Upon detecting this oversight, Yokohama Tire Corporation has designed and implemented verification countermeasures to prevent any recurrence of any incorrect tire markings.

**Describe what distinguishes the remedy component from the recalled component.**

The replacement tires show the correct Ply Rating and Load Range on both sides of tire. The replacement tires can be from other date ranges, or from other molds during the same date range.

**Identify and describe how and when the recall condition was corrected in production.**

This condition was corrected when the incorrect mold was removed from production in the 19th production week of 2018.

#### Identify the Recall Schedule

**Describe the recall schedule for notifications.:**

**Planned Dealer Notification Begin Date:**

**Planned Dealer Notification End Date:**

**Planned Owner Notification Begin Date:**

**Planned Owner Notification End Date:**

**Manufacturer's identification code for this recall (if applicable):**

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

#### Manufacturer Comments to NHTSA Staff

#### Document Upload

There are 0 documents associated with this report.

# Part 573 Safety Recall Report

# 18T-010

**Manufacturer Name :** Yokohama Tire Corporation**Submission Date :** JUL 12, 2018**NHTSA Recall No. :** 18T-010**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : Yokohama Tire Corporation

Address : 1 MacArthur Place

Santa Ana CA 92707

Company phone : 800 423 4544

**Population :**

Number of potentially involved : 4,704

Estimated percentage with defect : 19 %

**Tire Information :**

Tire Brand 1 : YOKOHAMA

Tire Line : RY023

Tire Size : 11R22.5 16(LR H) 146/143L

Descriptive Information : One sidewall shows incorrect load rating markings. The correct Branding is:  
"16 PR LOAD RANGE H

MAX. LOAD SINGLE 3000 kg (6610 lbs) AT 830 kPa (120 psi) COLD

MAX. LOAD DUAL 2725 kg (6005 lbs) AT 830 kPa (120 psi) COLD",

but the Serial Side shows:

"14 PR LOAD RANGE G

MAX. LOAD SINGLE 2800 kg (6175 lbs) AT 720 kPa (105 psi) COLD

MAX. LOAD DUAL 2650 kg (5840 lbs) AT 720 kPa (105 psi) COLD"

Production Dates : FEB 02, 2018 - MAY 17, 2018

**TIN (Tire Identification Number)**

Plant ID	Size code	Optional Code	Begin M Code	End M Code
FA	3T	JAE	0418	1918

**Description of Noncompliance :**

Description of the Noncompliance : During the manufacturing period, 1659 tires were manufactured at Yokohama Tire Manufacturing Mississippi, West Point, MS, in one mold with an incorrect Ply Rating / Load Range on one side (serial side). The correct Load Rating is 16 PR LOAD RANGE H, but the Serial Side shows 14 PR LOAD RANGE G

FMVSS 1 : 119 - New pneumatic tires- other than passenger cars

FMVSS 2 : NR

Description of the Safety Risk : Yokohama Tire Corporation intends to file a Petition for Exemption from the Notification and Remedy requirements of the Motor Vehicle Safety Act on the

grounds that this noncompliance is inconsequential as it relates to motor safety.

All of the noncompliant tires that are the subject of this information report have successfully met all other provisions and test criteria of 49 CFR, Ch. V, Section 571.119, New pneumatic tires for motor vehicles with a GVWR of more than 4,536 kilograms (10,000 pounds) and motorcycles

**Description of the Cause :** At a scheduled mold changeover, one of the two mold plugs was not removed, when changing from 14PR tires to 16PR tires.

**Identification of Any Warning that can Occur :** There is no relevant warning which can precede or occur.

## Supplier Identification :

### Component Manufacturer

Name : NR  
Address : NR  
NR  
Country : NR

## Chronology :

The inconsistent branding was noticed by a Yokohama dealer, and reported to YTC Field Service. Field Service confirmed the condition on the reported tire and notified the manufacturing facility and Corporate QA, who placed all warehouse quantities of this tire line on hold. Physical sorting of warehouse stock indicated that the anomaly was limited to a single mold (Mold No. 21, one of ten used during the suspect production period) during the specified time period. 895 tires were manufactured and sold.

## Description of Remedy :

**Description of Remedy Program :** Upon detecting this oversight, Yokohama Tire Corporation has designed and implemented verification countermeasures to prevent any recurrence of any incorrect tire markings.

**How Remedy Component Differs from Recalled Component :** The replacement tires show the correct Ply Rating and Load Range on both sides of tire. The replacement tires can be from other date ranges, or from other molds during the same date range.

**Identify How/When Recall Condition was Corrected in Production :** This condition was corrected when the incorrect mold was removed from production in the 19th production week of 2018.

## Recall Schedule :

Description of Recall Schedule : NR

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

### **Purchaser Information :**

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name : NR

Address : NR

NR

Country : NR

Company Phone : NR

\* NR - Not Reported