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CLIENT/MATTER NUMBER
109921-0110

March 18, 2019

BY HAND DELIVERY

Heidi King
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Petition for Determination of Inconsequential Noncompliance:
Pirelli Tire LLC

Dear Ms. King:

On behalf of Pirelli Tire LLC, I am submitting the enclosed Petition for Determination of Inconsequential Noncompliance pursuant to the National Traffic and Motor Vehicle Safety Act, 49 U.S.C. §§30118(d) and 30120(h), and 49 C.F.R. §§556.1-556.9. As discussed in the petition, Pirelli requests an exemption from the notice and remedy requirements of 49 U.S.C. §§30118 and 30120 on the grounds that the noncompliance to which this petition relates — tires marked with the incorrect maximum permissible inflation pressure — is inconsequential to motor vehicle safety.

Portions of Pirelli's petition contain confidential business information and, accordingly, we have submitted an unredacted version of this petition to the Office of Chief Counsel, along with a request for confidential treatment under 49 CFR Part 512.

Please contact me if you have any questions or need additional information.

Sincerely,

Christopher H. Grigorian

CHG:krb
Enclosures

cc: NHTSA – Recall Management Division

Pirelli Tire LLC

Petition for Determination of Inconsequential Noncompliance

March 18, 2019

Pirelli Tire LLC (Pirelli) submits this Petition for Determination of Inconsequential Noncompliance pursuant to the National Traffic and Motor Vehicle Safety Act (Safety Act), 49 U.S.C. §§ 30118(d) and 30120(h) and 49 C.F.R. §§ 556.1-556.9, for an exemption from the notice and remedy requirements of 49 U.S.C. §§ 30118 and 30120, on the ground that the noncompliance to which this petition relates is inconsequential to motor vehicle safety.

I. Background

As described in Pirelli's Part 573 noncompliance report, on February 7, 2019, Pirelli was advised by Pirelli Deutschland GMBH that it was investigating an informal report from an OEM customer, Mercedes-Benz, that the Korea Automobile Testing & Research Institute (KATRI) allegedly tested the subject tire, 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT tire (fitted onto a Daimler vehicle) and that the tire reportedly did not meet the tread strength (breaking energy) requirement under the Korean Motor Vehicle Safety Standard (KMVSS) performance standard "A", which in substance is similar to the tire strength test contained in FMVSS 109/139. Pirelli's investigation concluded that the subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked (and tested) accordingly. As a consequence of using test criteria applicable to a 340 kPa marked tire, however, the KATRI test indicated a test failure. (This is due to the different test criteria applicable to tires with a maximum permissible inflation pressure of 340 kPa vs. 350 kPa.) These tires fully meet the tire strength test applicable to tires with a maximum permissible inflation pressure of 350 kPa, as these were designed.

The tires were installed as original equipment on Mercedes-Benz E400 and E450, Coupé and Cabriolet, RWD and AWD ("4MATIC") vehicles, which were manufactured

by Daimler AG in Germany. Approximately 211 such vehicles (equipped with 422 tires; front tires only) were exported to the U.S. from approximately April 2017 through February 1, 2019. In addition, approximately 1,601 of these tires were sold by Pirelli into the U.S. replacement market.

Based upon the results of its investigation, Pirelli management determined that the labeling error had the effect of rendering the subject tires noncompliant with FMVSS 139, although the tires meet all applicable FMVSS 139 performance and safety standards with a maximum permissible inflation pressure of 350 kPa. Pirelli submitted a noncompliance report on February 25th, 2019 (copy attached) and indicated its intent to submit a petition for determination of inconsequentiality with respect to this noncompliance.

Pirelli is not aware of any warranty claims, field reports, customer complaints, legal claims, or any incidents or injuries related to the subject noncompliance.

For the reasons discussed below, Pirelli respectfully requests that this petition be granted.

II. Discussion

Under the Safety Act, each Federal motor vehicle safety standard promulgated by the National Highway Traffic Safety Administration (NHTSA) must be "practicable, meet the need for motor vehicle safety, and be stated in objective terms." 49 U.S.C. §30111(a). The Safety Act defines "motor vehicle safety" as:

> *the performance of a motor vehicle or motor vehicle equipment in a way that protects the public against unreasonable risk of accidents occurring because of the design, construction or performance of a motor vehicle, and against unreasonable risk of death or injury in an accident, and includes nonoperational safety of a motor vehicle.*

49 U.S.C. §30102(a)(8) (emphasis added).

The Safety Act exempts manufacturers from the Safety Act's notice and remedy requirements when the Secretary of Transportation determines that a defect or noncompliance is inconsequential as it relates to motor vehicle safety. *See* 49 U.S.C. §§30118(d) and 30120(h). These provisions demonstrate Congress's acknowledgement that there are cases where a vehicle or equipment does not comply with a safety standard,

yet the impact on motor vehicle safety is so slight that an exemption from the notice and remedy requirements of the Safety Act is justified. NHTSA has stated that the relevant consideration in evaluating an inconsequentiality petition is "whether an occupant who is affected by the noncompliance is likely to be exposed to a significantly greater risk than an occupant in a compliant vehicle." 69 Fed. Reg. 19897, 19900 (April 14, 2004).

In the context of tires specifically, the agency has similarly stated that it "believes that one measure of inconsequentiality to motor vehicle safety, in this case, is that there is no effect of the noncompliance on the operational safety of vehicles on which these tires are mounted. The safety of people working in the tire retread, repair and recycling industries must also be considered and is a measure of inconsequentiality." *See* 83 *Fed. Reg*. 36668, 36669 (July 30, 2018) (granting petition for determination of inconsequential noncompliance with respect to Continental tires marked with the incorrect number of tread plies); Tireco, Inc., Grant of Petition for Decision of Inconsequential Noncompliance, 76 *Fed. Reg.* 66353, 66354 (Oct. 26, 2011).

As described in Pirelli's noncompliance report, the subject tires were marked as having a maximum permissible inflation pressure of 340 kPa, although they were designed and engineered as having a maximum permissible inflation pressure of 350 kPa *for which they fully comply with all regulatory requirements*. The labeling error does not affect the safety or performance of the tires on any of the vehicle applications, for both original equipment and replacement fitment. Pirelli recognizes that due to this unintended reduction of the labeled maximum permissible inflation pressure, the tires (inadvertently) fall subject to a different tire strength test prescription under FMVSS 109/139, which these tires were not meant to satisfy. But even if, as a collateral consequence of the mislabeling, these tires would be deemed not to strictly conform the tire strength criteria for the tire *as labeled*, any such nonconformity would be inconsequential to safety. We address each of these issues in more detail below.

A. <u>The Subject Tires Meet or Exceed all Performance and Safety Requirements for Tires with a Maximum Permissible Inflation Pressure of 350 kPa, and the Mislabeling Has No Effect Whatsoever on Their Safety or Performance</u>

As noted, these tires were designed and engineered as tires with a maximum permissible inflation pressure of 350 kPa, and they meet or exceed all of the performance requirements for such tires. Specifically, the tires meet the applicable specifications contained in FMVSS 139 for Tire Dimensions under S6.1, High Speed Performance Test under S6.2, the Tire Endurance Test under S6.3, the Low Inflation Pressure Test under S6.4, and the Bead Unseating Test applicable under S6.6 (and FMVSS 109, S5.2). And, as noted, they meet the Tire Strength Test specified for tires with a maximum inflation pressure of 350 kPa, as these tires were designed, under S6.5 (and FMVSS 109, S5.3). (See Attachment 1)

Because these tires were labeled as having a maximum permissible inflation pressure of 340 kPa rather than 350 kPa, however, the tires would be subject to a different strength test specification under FMVSS 139 (which cross references FMVSS 109, S5.3), which they were not meant to satisfy. But the mislabeling of the tires has no effect on vehicle safety as compared to tires that are properly and correctly labeled with a maximum permissible inflation pressure of 350 kPa. The error does not present any risk of overinflation, since the design maximum permissible inflation pressure of 350 kPa is higher than the labeled inflation pressure of 340 kPa. As well, there is no risk of tire underinflation, since the calculated load carrying capacity of the tire at 340 kPa is met and exceeded by the design for 350 kPa.

Moreover, all of the tire load carrying information labeled on the tire is correct and, in fact, that information understates the load carrying capacity of the tire. (Because the tires were designed to have a maximum permissible inflation pressure of 350 kPa, according to the ETRTO guides, these tires have a load carrying capacity that is higher by 15 to 20 kg (see Attachment 2)).

In accordance with FMVSS No. 110, all vehicles must be equipped with a placard bearing information regarding the tires, the loading and the recommended inflation pressures, which has to be considered when choosing the tires to fit as replacement on each vehicle. Since the design maximum permissible inflation pressure of 350 kPa is higher that the labeled one of 340 kPa, the subject tire is always compliant to the placard.

In other words, labeling these tires with "340" rather than "350" has no effect whatsoever upon the safety or performance of the tires. Accordingly, the noncompliance should be found to be inconsequential to motor vehicle safety under 49 U.S.C. §§30118(d) and 30120(h).

NHTSA previously granted a petition to Michelin in an analogous situation. *See* Michelin North America, Grant of Petition for Decision of Inconsequential Noncompliance, 74 *Fed. Reg.* 10805 (Mar. 12, 2009). In that case, a tire was marked on one sidewall as having a maximum permissible inflation pressure of "300 kPa," while the other sidewall was marked "350 kPa." In concluding that this noncompliance was inconsequential to safety, NHTSA cited the following justifications:

> Since the load that is marked on both sides of the tire (i.e., 750 KG (1653 lb.)) is correct; the recommended inflation pressure (240 kPa (35 PSI)) is well below both the correct tire pressure of 300 kPa (44 PSI), and the incorrectly labeled tire pressure of 350 kPa (51 PSI); and, in any event, the tire was manufactured to safely accommodate a pressure of 350 kPa (51 PSI), the tire cannot be inadvertently overloaded.
>
> NHTSA agrees that the noncompliance is inconsequential to motor vehicle safety. The mislabeling does not cause any safety problems, such as increasing the probability of tire failure, if the tires were inflated to 350 kPa under a load of 750kg, and it is not likely to result in unsafe use of the tires.

Id. at 10806. In a similar case, NHTSA granted an inconsequentiality petition with respect to two tires, where one tire was mislabeled as having a maximum permissible inflation pressure of 350 kPa instead of 300 kPa, and the other tire was mislabeled as having a maximum permissible inflation pressure of 300 kPa instead of 350 kPa. Continental Tire the Americas, LLC, Grant of Petition for Decision of Inconsequential Noncompliance, 80 *Fed. Reg.* 31092 (June 1, 2015). The agency stated that, in both cases, the noncompliance "does not cause any safety problems, such as increasing the probability of tire failure, and it is unlikely to result in unsafe use of the tires." The agency stated that "both types of tires can safely accommodate the maximum inflation pressure of 350 KPA," and the agency agreed with the manufacturer that

> inflation of the tires to the incorrect maximum pressure value stamped on the sidewall will not result in overloading of their load carrying capacity since both values of 300 KPA and 350 KPA are above the inflation pressure of 250 KPA at which the tire's maximum load capacity is defined by the European Tyre and Rim Technical Organisation (ETRTO). Thus, the maximum load capacity of these tires can be obtained with the stamped pressures of 300 KPA and 350 KPA and

therefore following the maximum permissible inflation pressure values on the side wall of the tires will not lead to inadvertent overloading.

Id. at p. 31093.

Here, as in both cases cited above, the subject tires are marked with a lower maximum inflation pressure than their design would permit. Use of the maximum inflation pressure shown on the subject tire sidewall as the source of information for the recommended inflation pressure will not result in an overloading of the tires or reduce the load carrying capacity of the tires, because both values are above the recommended inflation pressures of 290 kPa for ETRTO standard and 280 kPa for TRA for the tire's maximum load rating.

As NHTSA has acknowledged, "[t]he choice of the maximum inflation pressure level then becomes the choice of the tire manufacturer, as long as it is in compliance with the established values under FMVSS No. 139 paragraph S5.5.4." 74 *Fed. Reg*. at 10806. Both 340 and 350 maximum inflation pressure levels are acceptable choices for this tire under S5.5.4.

NHTSA has previously stated that it has retained the requirement that tires be marked with the maximum permissible inflation pressure only "as an aid in preventing over-inflation," for which there is no risk in this case. *See* Michelin North America, Inc., Grant of Application for Decision that Noncompliance is Inconsequential to Motor Vehicle Safety, 70 *Fed. Reg*. 10161, 10162 (Mar. 2, 2005) (concluding that "the mislabeling issue in this case will in no way contribute to the risk of over-inflation because the value actually marked is lower than the value required by the regulations")

Because in this case, "there is no effect . . . on the operational safety of vehicles on which these tires are mounted" (s*ee* 83 Fed. Reg. at 36669), this noncompliance should be deemed inconsequential to motor vehicle safety.

B. The Different Tire Strength Test Criteria for Tires Marked with a Maximum Permissible Inflation Pressure of "340" vs. "350" Does Not Have Any Real-World Safety Relevance in this Case

As noted above, because these tires are labeled as having a maximum permissible inflation pressure of 340 kPa rather than 350 kPa, the tires would be subject to a different strength test criteria under FMVSS 109/139, which they were not meant to satisfy. Due to this labeling error, the appropriate specification to be applied should be that which is

applicable to the tire as designed, with a maximum permissible inflation pressure of 350 kPa.

FMVSS 139, S6.5 incorporates the tire strength test requirements of FMVSS 109, S5.3. Specifically, under the tire strength test in S5.3 of FMVSS 109 (which is cross-referenced in S6.5 of FMVSS 139), tires with a maximum permissible inflation pressure of 350 kPa should be tested at 180 kPa, while tires with a maximum pressure of 340 kPa should be tested at 220 kPa. (*See* FMVSS 109, Table II). When tested at these pressures using the test procedures specified in FMVSS 109, a tire with a maximum permissible inflation pressure of 350 kPa must have a minimum breaking energy of 294 joules, while a tire with a maximum permissible inflation pressure of 340 kPa must have a minimum breaking energy of 588 joules. The subject tires have shown a breaking energy of 455 joules, which far exceeds the requirements for tires marked with a maximum pressure of 350 kPa (i.e., 54.7% above the required threshold, as per Attachment 1).

Moreover, the subject tires were developed for a specific Mercedes-Benz application and, accordingly, they were subject to and fulfilled a very stringent OEM homologation process, including all customer requirements related to performance, quality and safety standards.

With specific reference to the Mercedes-Benz OE applications, the table below shows the following information for each of the vehicles for which the tires were fitted as original equipment:

- a summary of vehicle weights under "Normal Load" and "Maximum Load" operating conditions
- the recommended tire inflation pressures for "Normal Load" and "Maximum Load" operating conditions reported on the vehicles' placard
- minimum inflation pressures corresponding to each vehicles' load condition according to TRA standard
- the minimum inflation pressures corresponding to each load condition according to ETRTO standard, which the tire is intended to be referred to.

Car model		Loads on FRONT axle		Load on front tire and reccomended inflation pressure on placard	
		Normal load	Maximum load	Normal load	Maximum load
E400 Coupé	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1126 kg	1160 kg	563 kg 33 psi (228 kPa)	580 kg 33 (228 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			190 kPa 26 psi	200 kPa 26 psi
E400 Coupé - 4MATIC	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1191 kg	1225 kg	595,5 kg 33 psi (228 kPa)	612,5 kg kg 33 psi (228 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			210 kPa 29 psi	210 kPa 29 psi
E450 Coupé	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1126 kg	1160 kg	563 kg 33 psi (228 kPa)	580 kg 33 psi (228 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			190 kPa 26 psi	200 kPa 26 psi
E450 Coupé - 4MATIC	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1191 kg	1225 kg	595,5 kg 34 psi (234 kPa)	612,5 kg 35 psi (241 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			210 kPa 29 psi	210 kPa 29 psi
E400 Cabiolet	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1121 kg	1160 kg	560,5 kg 33 psi (228 kPa)	580 kg 33 psi (228 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			190 kPa 26 psi	200 kPa 26 psi
E400 Cabiolet - 4MATIC	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1186 kg	1225 kg	593 kg 33 psi (228 kPa)	612,5 kg 33 psi (228 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			200 kPa 29 psi	210 kPa 29 psi
E450 Cabiolet	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1121 kg	1160 kg	560,5 kg 33 psi (228 kPa)	580 kg 34 psi (234 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			190 kPa 26 psi	200 kPa 26 psi
E450 Cabiolet - 4MATIC	Axle / Tire load reccomended inflation pressure (up to 100 mph)*	1186 kg	1225 kg	593 kg 34 psi (234 kPa)	612,5 kg 35 psi (241 kPa)
	Min inflation pressure according to ETRTO** Min inflation pressure according to TRA			200 kPa 29 psi	210 kPa 29 psi

Notes: * for speed >100 mph the pressure should be increased by 4 psi
** considering a vehicle Vmax of 210 km/h
Front axle maximum camber under normal load conditions = 1,5° (including tolerances)
Front axle maximum camber under maximum load conditions = 1,7° (including tolerances)

worst cases

Either considering the TRA or the ETRTO standard for the maximum tire load carrying capacity calculation, a tire with a load index of 96 "Standard Load" would be appropriate fitment for each of the identified vehicles and would be more than sufficient to carry the vehicle's load both under "Normal Load" and "Maximum Load" conditions. In other words, under the above-reported operating conditions, a load index "100" "Extra Load" tire is not necessary to carry the vehicle loads (See Attachment 3).

Considering a tire with load index "96" "Standard Load," and marked with a maximum permissible inflation pressure of 350 kPa, basing on the above consideration, for each of the above-mentioned vehicles, the referenced strength test limit and testing conditions are sufficient to achieve all strength test related standards.

Importantly, the subject tires are self-supporting "run flat" tires designed with a reinforcing element in the sidewall that carries the vehicle load under zero (0) kPa inflation pressure operating conditions, thereby avoiding the complete deflection of the tire sidewall which may lead to the tire rim roll off. Thus, even in the event of a failure of the type that the tire strength test was originally intended to address, i.e., road hazards,

their run flat design enables the vehicle to maintain stability, drivability and control. Accordingly, there are no safety consequences in the event of such a failure.

The safety of these tires has been confirmed through rigorous testing under different testing methods focused to measure resistance to accidental impact damage and tire durability, as summarized below and detailed in the referenced attachments:

- **Curb test according to Mercedes-Benz test methodology**. This test was developed to verify the ability of a tire to resist road hazards. The subject tire fully meets OEM requirements showing a performance in line with the competitor and better than a standard tire compliant to maximum permissible inflation pressure of 340 kPa. (See CONFIDENTIAL Attachment 4)
- **Maximum Pressure Resistance (static blow out test) according to Pirelli methodology)**. This test is designed to measure the maximum inflation pressure a pneumatic tire is able to resist. The test results demonstrate that the subject tire is able to resist an inflation pressure of more than 3000 kPa. (See CONFIDENTIAL Attachment 5)
- **Rim roll-off test according to VDA (Verband Deutscher Automobilheresteller) methodology for run flat tires**. This test is designed to verify the maximum lateral acceleration achievable while driving in a bend with the front radially external tire at zero (0) kPa inflation pressure. (See CONFIDENTIAL Attachment 6)
- **Fatigue Test with cleat after artificial ageing according to FORD methodology.** This test is designed to verify the structural integrity of the tire to a very intensive stress in the tread and in the sidewall area. (See CONFIDENTIAL Attachment 7)
- **Run flat mileage test according to Mercedes-Benz test methodology**. This test is designed to verify the maximum mileage that the tire is able to run in the "flat running" condition (meaning with zero (0) kPa inflation pressure due to rim valve not in place for the duration of the "flat running" phase of the test). It is conducted at a maximum speed of 80 km/h and limiting the maximum lateral acceleration to 0.4g. The results demonstrate the capability of the tire to carry the vehicle partial load (corresponding for this test to 80% of the vehicle maximum load) for at least 150 km and the vehicle maximum load for 59 km, ensuring the ability to maintain full control of the vehicle even if one tire is completely deflated. (See

CONFIDENTIAL Attachment 8). (A run flat mileage test is clearly not foreseen by vehicle manufacturers for standard (non-run flat) tires.)

- **Rapid loss of inflation and lane change test** performed with the subject run flat tire, with the aim to simulate the event of a sudden air-loss caused by tread damage. (See CONFIDENTIAL Attachment 9) This test demonstrates that the driver is able to easily control the vehicle, performing a lane change to avoid an obstacle placed on the vehicle's trajectory and to safely stop it.
- **Integrity tests according to Pirelli methodology** confirm the high safety standards to which the subject tire has been designed and is able to achieve. (See CONFIDENTIAL Attachment 10).

To summarize, even if these tires had been intended to meet the tire strength test requirements applicable to a tire with a maximum permissible inflation pressure of 340 kPa, rather than subjected to such standard as an unintended collateral consequence of the labeling error, any inability of this particular tire to satisfy the criteria of the tire strength test is inconsequential to motor vehicle safety.

Pirelli is not aware of any warranty claims, field reports, customer complaints, legal claims, or any incidents or injuries related to the subject noncompliance.

III. Conclusion

The labeling noncompliance at issue here is inconsequential to motor vehicle safety. The subject tires were manufactured as designed, and they meet or exceed all FMVSS 139 performance standards applicable to tires with a maximum permissible inflation pressure of 350 kPa. Furthermore, all other sidewall markings related to tire service, including load capacity, are correct. Moreover, the mislabeling of these tires does not present a safety concern for consumers or for retreading, repairing and recycling personnel.

For the foregoing reasons, Pirelli believes the noncompliance is inconsequential to motor vehicle safety and respectfully requests that NHTSA exempt Pirelli from the notice and remedy requirements of the Safety Act.

Respectfully submitted,

Pirelli Tire LLC

Test according to FMVSS109 - Summary

TIRE DIMENSIONS						
Size	Tread	Spec	DOT	Rim	Press [Bar]	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	419	8	1,8	OK

BEAD UNSEATING								
Size	Tread	Spec	DOT	Rim	Press [Bar]	VALUE	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	419	8	1,8	13092 N	11120 N	OK

TIRE STRENGTH								
Size	Tread	Spec	DOT	Rim	Press [Bar]	E [J]	TARGET [J]	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	5018	8	1,8	455	294	OK

HIGH SPEED								
Size	Tread	Spec	DOT	Rim	Press [Bar]	Load [N]	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	5018	8	2,2	88% LI	V= 137 km/h trun= 210min	OK

ENDURANCE								
Size	Tread	Spec	DOT	Rim	Press [Bar]	Load [N]	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	5018	8	1,8	up to 100%LI	V= 80km/h t=34h	OK

PHYSICAL DIMENSIONS

PIRELLI Deutschland

Gedruckt am 07.02.2019
Prüfung beendet am 06.02.2019 15:51:06

Prüfart	: Abmessungen montiert (4)	Anforderer	: Erdogan, Hayri RH/D
Vorschrift	: RPB 581 / RPB 582 / RPB 583 / S (2) 245/45 R 18 100 Y XL		
Kunde	: DOT	Prüfer	: Ehrhard
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	Prüfnummer	: AM00282290

Dimension	: 245/45 R 18 100 Y XL			Profil	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: 31-242-19S0273	Rfn.Nr.	: 0	Identnummer	: 2479100
Fabrikat	: Pirelli			Farbcode	:

Bemerkungen (Pr)	:
Bemerkungen (Wh)	: orig. MB Felge 0mm

Kopfdaten

DOT	: 0419	**made_in**	: Romania	**Form-Nr.**	: R 33048
Barcode	: 3948222974	**Felge_ID**	: -		

Prüfeinstelldaten

Felge_MW	: 8	**Prüfdruck**	: 1.8 bar

Endmesswerte

max._Breite	: 246.0 mm	**Breite_1**	: 245.3 mm	**Breite_2**	: 245.5 mm
Breite_3	: 245.4 mm	**Breite_4**	: 245.6 mm	**Breite_5**	: 246.0 mm
Breite_6	: 245.7 mm	**durchschn._Breite**	: 245.6 mm	**Profiltiefe_1**	: 6.8 mm
Profiltiefe_2	: 7.0 mm	**Profiltiefe_3**	: 7.0 mm	**Profiltiefe_4**	: 6.9 mm
Profiltiefe_5	:	**Profiltiefe_6**	:	**Profiltiefe_7**	:
Profiltiefe_8	:	**Profiltiefe_9**	:	**Profiltiefe_MW**	: 6.9 mm
Durchmesser	: 678.0 mm	**Umfang_1**	: 2130.0 mm	**Umfang_2**	: 2130.0 mm
Umfang_3	: 2130.0 mm	**Umfang_max**	: 2130.0 mm	**Umfang_MW**	: 2130.0 mm
TWI_Umfang_1	: 1.7 mm	**TWI_Umfang_2**	: 1.7 mm	**TWI_Umfang_3**	: 1.7 mm
TWI_Umfang_4	: 1.8 mm	**TWI_Umfang_5**	: 1.8 mm	**TWI_Umfang_6**	: 1.8 mm
TWI_Breite_1	: 1.9 mm	**TWI_Breite_2**	: 1.7 mm	**TWI_Breite_3**	: 1.8 mm
TWI_Breite_4	: 1.8 mm	**TWI_Breite_5**	:	**TWI_Breite_6**	:
TWI_Anzahl	: 6	**Shorehärte**	: 70 Shore	**T_Raum**	: 23.7 °C
Limit_Breite_max	: 253 mm	**Limit_Breite_min**	: 233 mm	**Limit_Durchmesser_max**	: 684 mm
Limit_Durchmesser_min	: 671 mm	**Limit_TWI_min**	: 1.6 mm	**Limit_TWI_max**	: 2.2 mm
Anfang_Montage	: 06.02.2019 14:00	**Anfang_Messung**	: 06.02.2019 15:49	**FSR**	: Nein [j/n]
FSR_Zugabe	: 4 mm	**Bestanden**	: Ja		

BEAD UNSEATING

PIRELLI Deutschland

Gedruckt am 07.02.2019
Prüfung beendet am 07.02.2019 07:18:44

Prüfart	: Wulstabwurf (2)	**Anforderer**	: Erdogan, Hayri RH/D
Vorschrift	: RPB 581 / RPB 582 / RPB 583 / S (2) 245/45 R 18 100 Y XL		
Kunde	: DOT	**Prüfer**	: Muhn
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	**Prüfnummer**	: WA00282292

Dimension	: 245/45 R 18 100 Y XL			**Profil**	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: 31-242-19S0273	**Rfn.Nr.**	: 974	**Identnummer**	: 2479100
Fabrikat	: Pirelli			**Farbcode**	:

Bemerkungen (Pr)	:
Bemerkungen (Wh)	: orig MB - Felge 0mm

Kopfdaten

DOT	: 0419	**made_in**	: Romania	**Form-Nr.**	:
Barcode	: 3948222974	**Felge_ID**	: -		

Prüfeinstelldaten

Felge_MW	: 8	**Prüfdruck**	: 1.8 bar	**Armabstand_DOT**	: 318
Armabstand_CQC	: 318				

	Wert [<Keine>]
Limit_Breite_ab205mm	11350
Limit_Breite_160bis204mm	9100
Blocktyp_bis_19_Zoll	2A
Blocktyp_ab_20_Zoll	C

Endmesswerte

N_Ist_DOT_1	: 13070 N	**N_Ist_DOT_2**	: 13077 N	**N_Ist_DOT_3**	: 13091 N
N_Ist_DOT_4	: 13169 N	**N_Ist_DOT_5**	: 13051 N	**N_Ist_DOT_mittel**	: 13092 N
N_Ist_CQC_1	: 13070 N	**N_Ist_CQC_2**	: 13077 N	**N_Ist_CQC_3**	: 13091 N
N_Ist_CQC_4	: 13169 N	**N_Ist_CQC_5**	: 13070 N	**N_Ist_CQC_mittel**	: 13092 N
Bestanden_WA_DOT	:	**Bestanden_WA_CQC**	:	**Prüfprotokoll**	: \PAPPAPP258-16DE0282292.PDF

STRENGTH TEST

PIRELLI

Testing Department
Germany

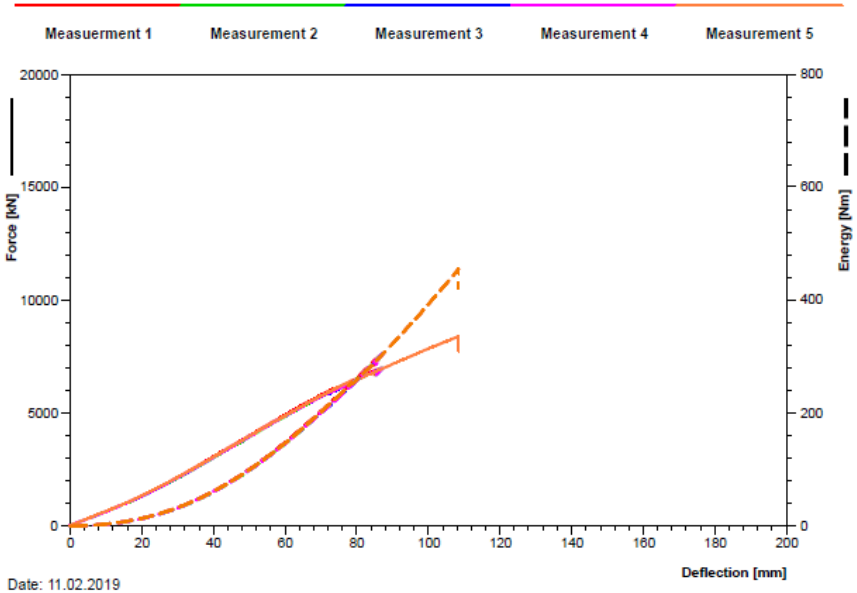
Instruction	: RPB 581 / RPB 582 / RPB 583 / S (2)	PA No.	: 00063064
Customer	: DOT	Operator	: Muhn
EA No.	: 131242	Test No.	: 00282591

Rem. (1)	:
Rem. (2)	: DOT 5018
Rem. (Instr.)	:

Dimension	: 245/45 R 18 100 Y XL	Treadpattern	: CINTURATO P7 * MOE RUNFLA
Specification	: NP	Ident. No.	: 24791
Manufacturer	: Pirelli	Tyre No.	: 560
DOT	: 5018	Mould No.	: R 31937
Made in	: Romania	Barcode	: 3950673560

Rim Width	: 8.0	Limit DOT	: 301 Nm
Rim ID	: -	Passed DOT	: Yes
Tyre Pressure	: 1.8 bar	Ø Energy	: 334.3 Nm
Max. Inflation	: 350kPa		
Remark	:		
Report	: \\pappapp258-16de\pruefstaende\Dorntest\Ergebnisse\Dorntest\00282591.pdf		

	Measurement 1	Measurement 2	Measurement 3	Measurement 4	Measurement 5
Deflection max [mm]	86.7	87.1	87.4	87.2	108.5
Force max [N]	6983	6985	6981	6978	8396
Energy max measured [Nm]	302.7	304.1	305.0	304.3	455.3
Energy max [Nm]	302.7	304.1	305.0	304.3	455.3



Date: 11.02.2019

Note: Measurements 1, 2, 3, 4: plunger movement stopped after reaching pass mark foreseen for 350 kPa marked tire

HIGH SPEED

PIRELLI Deutschland

Gedruckt am 12.02.2019
Prüfung beendet am 12.02.2019 17:18:13

Prüfart	: Schnelllauf (1)	**Anforderer**	: RH/D
Vorschrift	: FMVSS109 (1) 245/45 R 18 100 Y XL		
Kunde	: legal homologation	**Prüfer**	:
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	**Prüfnummer**	: SL00282684

Dimension	: 245/45 R 18 100 Y XL			**Profil**	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: NP	**Rfn.Nr.**	: 0	**Identnummer**	: 24791
Fabrikat	: Pirelli			**Farbcode**	:

Kopfdaten

DOT	: 5018	**made_in**	: Romania	**Form-Nr.**	: R31937
Barcode	: 3950037716	**Position**	: 6A	**Felge_ID**	: -

Prüfeinstelldaten

Felge_MW	: 8 "	**Prüfdruck**	: 2.2 bar	**Prüflast**	: 6975 N
Sturz	: 0 °	**Trommeldurchmesser**	: 1700 mm	**Trommelbelag**	: Stahl
Maschinen_Nr.	: 6299				

Messwerte

Breite	: 245 mm	**Durchmesser**	: 678 mm	**Gewicht**	: - kg
Umfang	:				

	v_soll [km/h]	v_ist [km/h]	t_soll [min]	t_ist [min]	t_Rampe [min]	Last_soll [N]	Last_ist [N]	dyn_RU [mm]	EF [mm]	T-Raum [°C]
1	80	80	120	120		6975	6978	2059	22.3	35.5
2	0	0	120	120		0	0	0	0	36.1
3	121	121	30	30		6975	6970	2064	22.1	38.0
4	129	129	30	30		6975	6980	2065	21.3	38.7
5	137	137	30	30		6975	6989	2067	21.1	37.9
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										

Endmesswerte

v_soll	: 137 km/h	**t_soll**	: 330 min	**Defekt_1**	: 1000
v_ist	: 137 km/h	**t_ist**	: 330 min	**Defekt_2**	:
Breite	: 245 mm	**Druck**	: 2.63 bar	**Defekt_3**	:
Durchmesser	: 680 mm	**Prüfdatum**	: 12.02.2019	**Beurteilung**	: Bestanden
Umfang	: 2138 mm	**Defekt-Foto**	:		

ENDURANCE

PIRELLI Deutschland

Gedruckt am 08.03.2019
Prüfung beendet am 14.02.2019 06:47:58

Prüfart	: Dauerlauf (1)	Anforderer	: RH/D
Vorschrift	: FMVSS109 (1) 245/45 R 18 100 Y XL		
Kunde	: DOT	Prüfer	: Kunkelmann
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	Prüfnummer	: DA00282689

Dimension	: 245/45 R 18 100 Y XL			Profil	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: NP	Rfn.Nr.	: 0	Identnummer	: 24791
Fabrikat	: Pirelli			Farbcode	:

Kopfdaten

DOT	: 5018	made_in	:	Form-Nr.	: R31552
Barcode	: 3950037753	Prüfstand	: DOT Rechts	Röntgen	:

Prüfeinstelldaten

Felge_MW	: 8 "	Prüfdruck	: 0 bar	Prüflast	: 0 N
Sturz	: 0 °				

Messwerte

Breite	: 245.0 mm	Durchmesser	: 680.0 mm	Gewicht	: 12.80 kg
EF_statisch	: 30.7 mm	Shorehärte	: - Shore		

	v_soll [km/h]	v_ist [km/h]	t_soll [h]	t_ist [h]	Last_soll [N]	Last_ist [N]	dyn_RR [mm]	dyn_EF [mm]	T-Reif. [°C]	T-Raum [°C]	Prüfdruck [bar]	Prüfdruck_ist [bar]
1	80	81	4	4.0	6738	6772	2057	25.6	-	38.0	1.8	1.87
2	80	81	6	6.0	7530	7564	2056	28.0	-	37.4	1.8	1.85
3	80	81	24	24.0	7926	7959	2055	29.1	-	37.4	1.8	1.84
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												

Endmesswerte

v_soll	: 80 km/h	t_soll	: 34 h	Defekt_1	: -
v_ist	: 80 km/h	t_ist	: 34.2 h	Defekt_2	: -
Breite	: 244.0 mm	Defekt_3	: -	Durchmesser	: 684.0 mm
EF_statisch	: 31 mm	T_Defekt	:	Laufstrecke	: 2737 km
Beurteilung	: bestanden	Defekt-Foto	: \PAPPAPP258-16DE0190282689	Druck	: 1.84 bar

Test according to FMVSS139 - Summary

PHIYSICAL DIMENSIONS						
Size	Tread	Spec	DOT	Rim	Press [Bar]	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	419	8	2.2	OK

BEAD UNSEATING								
Size	Tread	Spec	DOT	Rim	Press [Bar]	VALUE	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	419	8	1,8	13092 N	11120 N	OK

TIRE STRENGTH								
Size	Tread	Spec	DOT	Rim	Press [Bar]	E [J]	TARGET [J]	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	5018	8	1,8	455	294	OK

HIGH SPEED								
Size	Tread	Spec	DOT	Rim	Press [Bar]	Load [N]	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	4518	8	2,6	85% LI	V= 160 km/h trun= 210min	OK

ENDURANCE								
Size	Tread	Spec	DOT	Rim	Press [Bar]	Load [N]	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	5018	8	2,2	up to 100% LI	V= 120km/h t=34h	OK
ENDURANCE LOW PRESSURE								
Size	Tread	Spec	DOT	Rim	Press [Bar]	Load [N]	TARGET	PASS
245/45 R 18 100 Y XL	CP7 * MOE	NP	5018	8	1,6	100% LI	V=120km/h t=3,5h	OK

PHYSICAL DIMENSIONS

PIRELLI Deutschland

Gedruckt am 07.02.2019
Prüfung beendet am 07.02.2019 06:24:27

1/1

Prüfart	: Abmessungen montiert (4)	**Anforderer**	: Erdogan, Hayri RH/D
Vorschrift	: RPB 581 / RPB 582 / RPB 583 / S (2) 245/45 R 18 100 Y XL		
Kunde	: DOT	**Prüfer**	: Muhn
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	**Prüfnummer**	: AM00282291

Dimension	: 245/45 R 18 100 Y XL			**Profil**	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: 31-242-19S0273	**Rfn.Nr.**	: 0	**Identnummer**	: 2479100
Fabrikat	: Pirelli			**Farbcode**	:

Bemerkungen (Pr)	:
Bemerkungen (Wh)	: orig. MB Felge 0mm

Kopfdaten

DOT	: 0419	**made_in**	: Romania	**Form-Nr.**	: R 33048
Barcode	: 3948222974	**Felge_ID**	: -		

Prüfeinstelldaten

Felge_MW	: 8	**Prüfdruck**	: 2.2 bar

Endmesswerte

max._Breite	: 244.9 mm	**Breite_1**	: 244.6 mm	**Breite_2**	: 244.8 mm
Breite_3	: 244.5 mm	**Breite_4**	: 244.9 mm	**Breite_5**	: 244.6 mm
Breite_6	: 244.7 mm	**durchschn._Breite**	: 244.7 mm	**Profiltiefe_1**	: 6.8 mm
Profiltiefe_2	: 7.0 mm	**Profiltiefe_3**	: 7.0 mm	**Profiltiefe_4**	: 6.9 mm
Profiltiefe_5	: - mm	**Profiltiefe_6**	: - mm	**Profiltiefe_7**	: - mm
Profiltiefe_8	: - mm	**Profiltiefe_9**	: - mm	**Profiltiefe_MW**	: 6.9 mm
Durchmesser	: 679.0 mm	**Umfang_1**	: 2133.0 mm	**Umfang_2**	: 2133.0 mm
Umfang_3	: 2133.0 mm	**Umfang_max**	: 2133.0 mm	**Umfang_MW**	: 2133.0 mm
TWI_Umfang_1	: 1.7 mm	**TWI_Umfang_2**	: 1.7 mm	**TWI_Umfang_3**	: 1.7 mm
TWI_Umfang_4	: 1.8 mm	**TWI_Umfang_5**	: 1.8 mm	**TWI_Umfang_6**	: 1.7 mm
TWI_Breite_1	: 1.9 mm	**TWI_Breite_2**	: 1.7 mm	**TWI_Breite_3**	: 1.8 mm
TWI_Breite_4	: 1.8 mm	**TWI_Breite_5**	:	**TWI_Breite_6**	:
TWI_Anzahl	: 6	**Shorehärte**	: 70 Shore	**T_Raum**	: 24.4 °C
Limit_Breite_max	: 253 mm	**Limit_Breite_min**	: 233 mm	**Limit_Durchmesser_max**	: 684 mm
Limit_Durchmesser_min	: 671 mm	**Limit_TWI_min**	: 1.6 mm	**Limit_TWI_max**	: 2.2 mm
Anfang_Montage	: 06.02.2019 14:00	**Anfang_Messung**	: 07.02.2019 06:22	**FSR**	: Nein [j/n]
FSR_Zugabe	: 4 mm	**Bestanden**	: Ja		

BEAD UNSEATING

PIRELLI Deutschland

Gedruckt am 07.02.2019
Prüfung beendet am 07.02.2019 07:18:44

1/1

Prüfart	: Wulstabwurf (2)	**Anforderer**	: Erdogan, Hayri RH/D
Vorschrift	: RPB 581 / RPB 582 / RPB 583 / S (2) 245/45 R 18 100 Y XL		
Kunde	: DOT	**Prüfer**	: Muhn
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	**Prüfnummer**	: WA00282292

Dimension	: 245/45 R 18 100 Y XL			**Profil**	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: 31-242-19S0273	**Rfn.Nr.**	: 974	**Identnummer**	: 2479100
Fabrikat	: Pirelli			**Farbcode**	:

Bemerkungen (Pr)	:
Bemerkungen (Wh)	: orig MB - Felge 0mm

Kopfdaten

DOT	: 0419	**made_in**	: Romania	**Form-Nr.**	:
Barcode	: 3948222974	**Felge_ID**	: -		

Prüfeinstelldaten

Felge_MW	: 8	**Prüfdruck**	: 1.8 bar	**Armabstand_DOT**	: 318
Armabstand_CQC	: 318				

	Wert [<Keine>]
Limit_Breite_ab205mm	11350
Limit_Breite_160bis204mm	9100
Blocktyp_bis_19_Zoll	2A
Blocktyp_ab_20_Zoll	C

Endmesswerte

N_Ist_DOT_1	: 13070 N	**N_Ist_DOT_2**	: 13077 N	**N_Ist_DOT_3**	: 13091 N
N_Ist_DOT_4	: 13169 N	**N_Ist_DOT_5**	: 13051 N	**N_Ist_DOT_mittel**	: 13092 N
N_Ist_CQC_1	: 13070 N	**N_Ist_CQC_2**	: 13077 N	**N_Ist_CQC_3**	: 13091 N
N_Ist_CQC_4	: 13169 N	**N_Ist_CQC_5**	: 13070 N	**N_Ist_CQC_mittel**	: 13092 N
Bestanden_WA_DOT	:	**Bestanden_WA_CQC**	:	**Prüfprotokoll**	: \PAPPAPP258-16DE0282292.PDF

STRENGTH TEST

PIRELLI

Testing Department
Germany

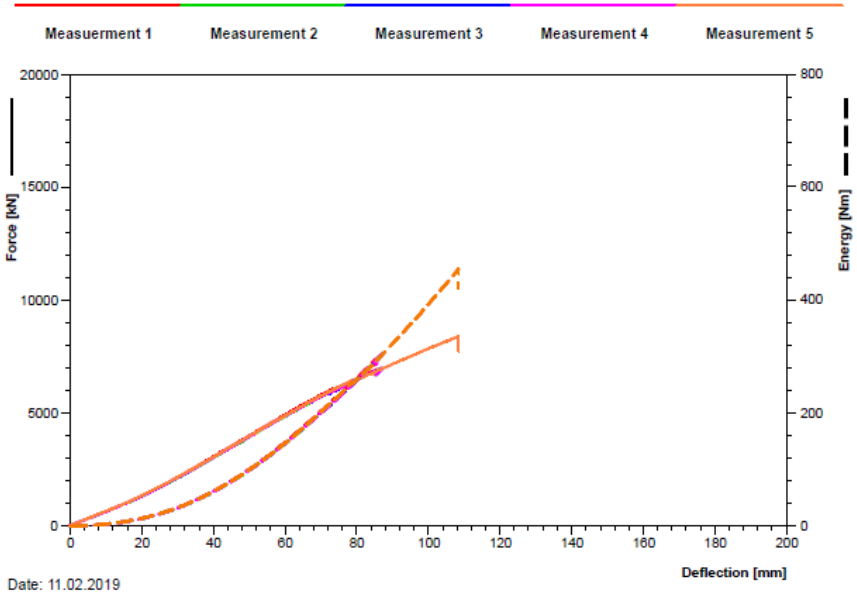
Instruction	: RPB 581 / RPB 582 / RPB 583 / S (2)	PA No.	: 00063064
Customer	: DOT	Operator	: Muhn
EA No.	: 131242	Test No.	: 00282591

Rem. (1)	:
Rem. (2)	: DOT 5018
Rem. (Instr.)	:

Dimension	: 245/45 R 18 100 Y XL	Treadpattern	: CINTURATO P7 * MOE RUNFLA
Specification	: NP	Ident. No.	: 24791
Manufacturer	: Pirelli	Tyre No.	: 560
DOT	: 5018	Mould No.	: R 31937
Made in	: Romania	Barcode	: 3950673560

Rim Width	: 8.0	Limit DOT	: 301 Nm
Rim ID	: -	Passed DOT	: Yes
Tyre Pressure	: 1.8 bar	Ø Energy	: 334.3 Nm
Max. Inflation	: 350kPa		
Remark	:		
Report	: \\pappapp258-16de\pruefstaende\Dorntest\Ergebnisse\Dorntest\00282591.pdf		

	Measurement 1	Measurement 2	Measurement 3	Measurement 4	Measurement 5
Deflection max [mm]	86.7	87.1	87.4	87.2	108.5
Force max [N]	6983	6985	6981	6978	8396
Energy max measured [Nm]	302.7	304.1	305.0	304.3	455.3
Energy max [Nm]	302.7	304.1	305.0	304.3	455.3



Date: 11.02.2019

Note: Measurements 1, 2, 3, 4: plunger movement stopped after reaching pass mark foreseen for 350 kPa marked tire

HIGH SPEED

PIRELLI Deutschland

Gedruckt am 07.02.2019
Prüfung beendet am 07.02.2019 06:24:25

1/1

Prüfart	: Schnelllauf (1)	Anforderer	: Erdogan, Hayri RH/D
Vorschrift	: RPB487 (1) 245/45 R 18 100 Y XL		
Kunde	: DOT	Prüfer	: Rosin
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	Prüfnummer	: SL00282300

Dimension	: 245/45 R 18 100 Y XL			Profil	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: 31-242-19S0273	Rfn.Nr.	: 0	Identnummer	: 2479100
Fabrikat	: Pirelli			Farbcode	:

Bemerkungen (Pr)	:
Bemerkungen (Wh)	: orig. MB - Felge 0mm

Kopfdaten

DOT	: 4518	**made_in**	: Romania	**Form-Nr.**	: R 40119
Barcode	:	**Position**	: Links	**Felge_ID**	:

Prüfeinstelldaten

Felge_MW	: 8 "	**Prüfdruck**	: 2.6 bar	**Prüflast**	: 6738 N
Sturz	: 0 °	**Trommeldurchmesser**	:	**Trommelbelag**	: Stahl
Maschinen_Nr.	:				

Messwerte

Breite	: 243.0 mm	**Durchmesser**	: 680.0 mm	**Gewicht**	: 12.66 kg
Umfang	: - mm				

	v_soll [km/h]	v_ist [km/h]	t_soll [min]	t_ist [min]	t_Rampe [min]	Last_soll [N]	Last_ist [N]	dyn_RU [mm]	EF [mm]	T-Raum [°C]
1	80	81	120	120			6721	2069	20.5	35.3
2	0	0	120	120			-	-	-	36.7
3	140	140	30	30			6726	2082	19.1	35.3
4	150	151	30	30			6724	2079	18.6	35.1
5	160	161	30	30			6722	2082	18.2	35.1
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										

Endmesswerte

v_soll	: 160 km/h	**t_soll**	: 330 min	**Defekt_1**	: -
v_ist	: 160 km/h	**t_ist**	: 330 min	**Defekt_2**	: -
Breite	: 243.0 mm	**Druck**	: 2.62 bar	**Defekt_3**	: -
Durchmesser	: 682.0 mm	**Prüfdatum**	: 07.02.2019	**Beurteilung**	: bestanden
Umfang	: 682 mm	**Defekt-Foto**	: \PAPPAPP258-16DE0190282300		

ENDURANCE

PIRELLI Deutschland

Gedruckt am 08.03.2019
Prüfung beendet am 20.02.2019 05:19:36

Prüfart	: Dauerlauf (1)	Anforderer	: RH/D
Vorschrift	: FMVSS139 (1) 245/45 R 18 100 Y XL		
Kunde	: DOT	Prüfer	: Rosin
EA-Nr.	: 131242 (245/45 R18 100Y XL CINTURATO P7 * MOE RUNFLAT	Prüfnummer	: DA00283101

Dimension	: 245/45 R 18 100 Y XL			Profil	: CINTURATO P7 * MOE RUNFLA
Spezifikation	: NP	Rfn.Nr.	: 535	Identnummer	: 24791
Fabrikat	: Pirelli			Farbcode	:

Kopfdaten

DOT	: 5018	**made_in**	: Romania	**Form-Nr.**	: R 31552
Barcode	: 3950673535	**Prüfstand**	: DOT Links	**Röntgen**	:

Prüfeinstelldaten

Felge_MW	: 8 "	**Prüfdruck**	: 0 bar	**Prüflast**	: 0 N
Sturz	: 0 °				

Messwerte

Breite	: 244.0 mm	**Durchmesser**	: 679.0 mm	**Gewicht**	: 12.72 kg
EF_statisch	: 27.7 mm	**Shorehärte**	: - Shore		

	v_soll [km/h]	v_ist [km/h]	t_soll [h]	t_ist [h]	Last_soll [N]	Last_ist [N]	dyn_RR [mm]	dyn_EF [mm]	T-Reif. [°C]	T-Raum [°C]	Prüfdruck [bar]	Prüfdruck_ist [bar]
1	120	120	4	4.0	6805	6776	2064	21.6	-	37.1	2.2	2.29
2	120	120	6	6.0	7205	7186	2068	23.1	-	36.8	2.2	2.27
3	120	120	24	24.0	7926	7902	2061	25.2	-	36.8	2.2	2.27
4	0	-	2	2.0	0	-	-	-	-	38.0	1.6	1.65
5	120	120	1.5	1.5	7926	7904	2062	25.0	-	37.0	1.6	1.65
6												
7												
8												
9												
10												
11												
12												
13												
14												

Endmesswerte

v_soll	: 120 km/h	**t_soll**	: 37.5 h	**Defekt_1**	: 1000
v_ist	: 120 km/h	**t_ist**	: 37.7 h	**Defekt_2**	: -
Breite	: 243.0 mm	**Defekt_3**	: -	**Durchmesser**	: 680.0 mm
EF_statisch	: 27 mm	**T_Defekt**	:	**Laufstrecke**	: 4277 km
Beurteilung	: bestanden	**Defekt-Foto**	: \PAPPAPP258-16DE0190283101	**Druck**	: 1,64 bar

ETRTO Load Carrying Capacity Calculation
Case Camber = 2,5°

Velocity

Passenger Cars

Tyres fitted on 5° Tapered code designated rims - Radial

245/45 R 18 100 Y Reinforced/Extra Load

Inflation pressure

km/h max	230	240	250	260	270	280	290	300	310	320	330	340	350
160	645	670	690	715	735	755	780	800					
170	645	670	690	715	735	755	780	800					
180	645	670	690	715	735	755	780	800					
190	645	670	690	715	735	755	780	800					
200	645	670	690	715	735	755	780	800					
210	645	670	690	715	735	755	780	800					
220	645	670	690	715	735	755	780	800					
230	630	650	675	695	715	735	760	780	800				
240	615	635	655	680	700	720	740	760	780	800			
250	600	620	640	660	680	700	720	740	760	780	800		
260	585	605	625	645	665	685	705	725	745	760	780	800	
270	570	590	610	630	650	670	690	705	725	745	765	780	800
275	555	575	595	615	635	650	670	690	710	725	745	760	780
280	545	560	580	600	620	635	655	670	690	705	725	745	760
285	530	545	565	585	600	620	635	655	670	690	705	725	740
290	515	530	550	570	585	600	620	635	655	670	685	705	720
295	500	520	535	550	570	585	600	620	635	650	670	685	700
300	485	505	520	535	555	570	585	600	615	635	650	665	680

Underlined load capacities are not applicable for the 'Vehicle Normal Load'

- the "Vehicle Normal Load on the tyre" (i.e. the load on an individual tyre that is determined by distributing to each axle its share of the "Kerb mass", the "Accessory mass" and the "Normal occupant mass", as defined below, and dividing by the number of tyres on the axle) shall not be greater than 88% of the load capacity corresponding to the tyre's Load Index.

The "*Normal occupant mass*" is the mass of 68 kg multiplied by the Vehicle normal load number of occupants (driver included) distibuted as specified in the table following. When local regulations include a luggage mass located in the luggage compartment, a mass of 7 kg per occupant shall be added.

ETRTO Load Carrying Capacity Calculation
Case Camber = 3°

Velocity

Passenger Cars

Tyres fitted on 5° Tapered code designated rims - Radial

245/45 R 18 100 Y Reinforced/Extra Load

Inflation pressure

km/h max	250	260	270	280	290	300	310	320	330	340	350	360	370
160	675	695	715	735	760	780	800						
170	675	695	715	735	760	780	800						
180	675	695	715	735	760	780	800						
190	675	695	715	735	760	780	800						
200	675	695	715	735	760	780	800						
210	675	695	715	735	760	780	800						
220	675	695	715	735	760	780	800						
230	655	680	700	720	740	760	780	800					
240	640	660	680	700	720	740	760	780	800				
250	625	645	665	685	705	725	745	760	780	800			
260	600	615	635	655	675	690	710	730	745	765	780	800	
270	585	605	620	640	660	675	695	710	730	750	765	785	800
275	570	590	605	625	640	660	675	695	710	730	745	765	780
280	555	575	590	610	625	645	660	675	695	710	725	745	760
285	540	560	575	590	610	625	640	660	675	690	710	725	740
290	525	545	560	575	595	610	625	640	655	675	690	705	720
295	510	530	545	560	575	590	610	625	640	655	670	685	700
300	495	515	530	545	560	575	590	605	620	635	650	665	680

Underlined load capacities are not applicable for the 'Vehicle Normal Load'

- the "Vehicle Normal Load on the tyre" (i.e. the load on an individual tyre that is determined by distributing to each axle its share of the "Kerb mass", the "Accessory mass" and the "Normal occupant mass", as defined below, and dividing by the number of tyres on the axle) shall not be greater than 88% of the load capacity corresponding to the tyre's Load Index.

The "*Normal occupant mass*" is the mass of 68 kg multiplied by the Vehicle normal load number of occupants (driver included) distibuted as specified in the table following. When local regulations include a luggage mass located in the luggage compartment, a mass of 7 kg per occupant shall be added.

ETRTO Load Carrying Capacity Calculation
Case Camber = 3,5°

Velocity

Passenger Cars

Tyres fitted on 5° Tapered code designated rims - Radial

245/45 R 18 **100 Y** **Reinforced/Extra Load**

Inflation pressure

km/h max	260	270	280	290	300	310	320	330	340	350	360	370	380
160	660	680	700	720	740	760	780	800					
170	660	680	700	720	740	760	780	800					
180	660	680	700	720	740	760	780	800					
190	660	680	700	720	740	760	780	800					
200	660	680	700	720	740	760	780	800					
210	660	680	700	720	740	760	780	800					
220	660	680	700	720	740	760	780	800					
230	645	665	685	705	725	745	760	780	800				
240	630	650	670	690	705	725	745	765	780	800			
250	615	635	655	675	690	710	730	745	765	780	800		
260	605	620	640	660	675	695	710	730	750	765	785	800	
270	590	610	625	645	660	680	695	715	730	750	765	785	800

Underlined load capacities are not applicable for the 'Vehicle Normal Load'

- the "Vehicle Normal Load on the tyre" (i.e. the load on an individual tyre that is determined by distributing to each axle its share of the "Kerb mass", the "Accessory mass" and the "Normal occupant mass", as defined below, and dividing by the number of tyres on the axle) shall not be greater than 88% of the load capacity corresponding to the tyre's Load Index.

The "*Normal occupant mass*" is the mass of 68 kg multiplied by the Vehicle normal load number of occupants (driver included) distibuted as specified in the table following. When local regulations include a luggage mass located in the luggage compartment, a mass of 7 kg per occupant shall be added.

ETRTO Load Carrying Capacity Calculation
Case Camber = 4°

Velocity

Passenger Cars

Tyres fitted on 5° Tapered code designated rims - Radial

245/45 R 18 100 Y Reinforced/Extra Load

Inflation pressure

km/h max	280	290	300	310	320	330	340	350	360	370	380	390	400
160	685	705	725	745	760	780	800						
170	685	705	725	745	760	780	800						
180	685	705	725	745	760	780	800						
190	685	705	725	745	760	780	800						
200	685	705	725	745	760	780	800						
210	685	705	725	745	760	780	800						
220	685	705	725	745	760	780	800						
230	670	690	705	725	745	765	780	800					
240	655	675	690	710	730	745	765	780	800				
250	640	660	675	695	710	730	750	765	785	800			
260	615	630	650	665	685	700	715	735	750	765	785	800	
270	600	620	635	650	670	685	700	720	735	750	770	785	800

- the "Vehicle Normal Load on the tyre" (i.e. the load on an individual tyre that is determined by distributing to each axle its share of the "Kerb mass", the "Accessory mass" and the "Normal occupant mass", as defined below, and dividing by the number of tyres on the axle) shall not be greater than 88% of the load capacity corresponding to the tyre's Load Index.

The "*Normal occupant mass*" is the mass of 68 kg multiplied by the Vehicle normal load number of occupants (driver included) distibuted as specified in the table following. When local regulations include a luggage mass located in the luggage compartment, a mass of 7 kg per occupant shall be added.

Underlined load capacities are not applicable for the 'Vehicle Normal Load'

TRA - Maximum tire load carrying capacity calculation

FMVSS 109

Load rating means the maximum load a tire is rated to carry for a given inflation pressure.

Maximum permissible inflation pressure means the maximum cold inflation pressure to which a tire may be inflated.

Maximum load rating means the load rating at the maximum permissible inflation pressure for that tire.

FMVSS 139

Reinforced tire means a tire designed to operate at higher loads and at higher inflation pressures than the corresponding standard tire.

TRA - "P" metric

psi	22	23	24	25	**26**	27	28	**29**	30	31	**32**	33	34	**35**	**36**	37	**38**	39	40	**41**	42
Load 96Y (lb)					**1299**			1391			**1479**			**1565**							
Load 100Y XL (lb)	1036	1091	1126	1146	**1299**	1237	1257	1391	1367	1382	**1479**	1466	1488	**1565**	**1638**	1592	1680	1664	1694	**1764**	
kPa calculated																				282,695	
kPa					**180**			**200**			**220**			**240**	**250**		**260**			**280**	**290**
Bar	1,52	1,59	1,65	1,72	1,79	1,86	1,93	2,00	2,07	2,14	2,21	2,28	2,34	2,41	**2,48**	2,55	2,62	2,69	2,76	2,83	
Load 96Y (kg)					**589**			**631**			**671**			**710**							
Load 100Y XL (kg)	470	495	511	520	**589**	561	570	**631**	620	627	**671**	665	675	**710**	**743**	722	**762**	755	768	**800**	

"P" TYPE RADIAL TIRES USED ON PASSENGER VEHICLES
GENERAL DATA
TIRE AND RIM ASSOCIATION STANDARD

Millimeters/*Inches*

TIRE SIZE DESIG-NATION	MEAS. RIM WIDTH	DESIGN TIRE SECTION WIDTH	DESIGN TIRE OVERALL DIAMETER HWY/ TRAC.	DESIGN TIRE OVERALL DIAMETER DEEP TRAC.	MAXIMUM GROWN TIRE OVERALL WIDTH (7) (For tire designs prior to 4/18/07)	MAXIMUM GROWN TIRE OVERALL WIDTH (7) (For tire designs after 4/18/07)	MAXIMUM GROWN TIRE OVERALL DIAMETER HWY/ TRAC.	MAXIMUM GROWN TIRE OVERALL DIAMETER DEEP TRAC.	*MIN. SIZE FACTOR	APPROVED RIM CONTOURS
45 SERIES (CONTINUED)										
P245/45R18	*8.00*	243 *9.57*	677 *26.65*	-- --	258 *10.16*	253 *9.96*	685 *26.97*	-- --	906 *35.67*	7½J, 8J, 8½J, 9J
P255/45R18	*8.50*	255 *10.04*	687 *27.05*	-- --	270 *10.63*	265 *10.43*	695 *27.36*	-- --	927 *36.50*	8J, 8½J, 9J, 9½J
(P)265/45R18	*9.00*	266 *10.47*	695 *27.36*	-- --	-- --	277 *10.91*	705 *27.76*	-- --	946 *37.24*	8½J, 9J, 9½J, 10J
P275/45R18	*9.00*	273 *10.75*	705 *27.76*	-- --	-- --	284 *11.18*	715 *28.15*	-- --	962 *37.87*	8½J, 9J, 9½J, 10J, 10½J
P295/45R18	*10.00*	296 *11.65*	723 *28.46*	--	314 *12.36*	308 *12.13*	733 *28.86*	--	1002 *39.45*	9½J, 10J, *10½J, 11J*

"P" TYPE RADIAL TIRES USED ON PASSENGER VEHICLES
TABLE P-1 TIRE AND RIM ASSOCIATION STANDARD
See pages 1-03 thru 1-07 for TIRE SELECTION PROCEDURE.

TIRE SIZE DESIGNATION	LOAD INDEX LL	LOAD INDEX SL(ISO)	LOAD INDEX XL(ISO)	TIRE LOAD LIMITS AT VARIOUS COLD INFLATION PRESSURES kPa / *psi*	180 *26*	200 *29*	220 *32*	240 *35*	250 *36*	260 *38*	280 *41*	290 *42*
45 SERIES (CONTINUED)												
P245/45R18	--	96	--	kg	589	631	671	710				
				lbs.	*1299*	*1391*	*1479*	*1565*				
	--	--	100	kg	589	631	671	710	743	762	800	
				lbs.	*1299*	*1391*	*1479*	*1565*	*1638*	*1680*	*1764*	
P255/45R18	93	--	--	kg	565	595	620	650				
				lbs.	*1246*	*1312*	*1367*	*1433*				
	--	99	--	kg	643	688	732	775				
				lbs.	*1418*	*1517*	*1614*	*1709*				
(P)265/45R18	--	101	--	kg	665	715	760	805	825			
				lbs.	*1466*	*1576*	*1675*	*1775*	*1819*			
P275/45R18	--	103	--	kg	705	755	805	850	875			
				lbs.	*1554*	*1664*	*1775*	*1874*	*1929*			
P295/45R18	101	--	--	kg	720	755	795	825				
				lbs.	*1587*	*1664*	*1753*	*1819*				
	--	108	--	kg	829	888	945	1000				
				lbs.	*1828*	*1958*	*2083*	*2205*				
(P)305/45R18	103	--	--	kg	705	755	805	850	875			
				lbs.	*1554*	*1664*	*1775*	*1874*	*1929*			

ETRTO - Maximum tire load carrying capacity calculation

245/45R18			kPa	180	200	220	240	250	260	270	280	290
			psi	26	29	32	35	36	38	39	41	42
Load Carrying Capacity	Standard	96	kg	545	595	640	685	710				
			lbs	1201	1312	1411	1510	1565				
	Extra Load	100	kg	545	595	640	685	710	735	755	780	800
			lbs	1201	1312	1411	1510	1565	1620	1664	1720	1764

STANDARD LOAD

96Y Camber 2°

km/h	180	190	200	210	220	230	240	250	260	270	280	290	300
160	545	570	595	620	640	665	685	710					
170	545	570	595	620	640	665	685	710					
180	545	570	595	620	640	665	685	710					
190	545	570	595	620	640	665	685	710					
200	545	570	595	620	640	665	685	710					
210	545	570	595	620	640	665	685	710	<== Reference max speed for US Market				
220	545	570	595	620	640	665	685	710					
230	530	550	575	600	620	645	665	690	710				
240	515	535	560	580	605	625	645	670	690	710			
250	500	520	540	565	585	605	630	650	670	690	710		
260	485	505	525	550	570	590	610	630	650	670	690	710	
270	470	495	515	535	555	575	595	615	635	655	670	690	710
275	460	480	500	520	540	560	580	600	615	635	655	675	690
280	450	470	485	505	525	545	565	585	600	620	640	655	675
285	435	455	475	495	515	530	550	570	585	605	620	640	655
290	425	445	460	480	500	515	535	550	570	585	605	620	640
295	415	430	450	465	485	500	520	535	555	570	590	605	620
300	400	420	435	455	470	490	505	520	540	555	570	590	605

Max "vehicle normal load"	710	0,88	624,8

Values in red: load capacities are not applicable for the 'Vehicle Normal Load'

ETRTO - Maximum tire load carrying capacity calculation

Passenger Car Tyres — *Tyres with Metric Designation*

8.7 '45' SERIES – METRIC DESIGNATION

TYRE SIZE DESIGNATION			Load Index		MEASURING RIM WIDTH CODE (1)	TYRE DIMENSIONS				LOAD CAPACITY (kg)		INFLATION PRESSURE (kPa)	
						DESIGN		MAXIMUM IN SERVICE					
			Std	Reinf.		Section Width	Overall Diameter	Overall Width	Overall Diameter	Std.	Reinf.	Std.	Reinf.
	R	20	96	100	8.0	236	720	245	728	710	800		
	R	22	–	103	8.0	236	771	245	779	–	875	250	290
245/45	R	16	94	98	8.0	243	626	253	634	670	750		
	R	17	95	99	8.0	243	652	253	660	690	775		
	R	18	96	100	8.0	243	677	253	685	710	800		
	R	19	98	102	8.0	243	703	253	711	750	850		
	R	20	99	103	8.0	243	728	253	736	775	875		
	R	21	–	104	8.0	243	753	253	761	–	900		
255/45	R	17	98	102	8.5	255	662	265	672	750	850		

- the "Vehicle Normal Load on the tyre" (i.e. the load on an individual tyre that is determined by distributing to each axle its share of the "Kerb mass", the "Accessory mass" and the "Normal occupant mass", as defined below, and dividing by the number of tyres on the axle) shall not be greater than 88% of the load capacity corresponding to the tyre's Load Index.

(*) Note: for vehicle of previous design (model year 2003 and former) the number of occupants, for the calculation of the "vehicle normal load", was "2 in front" for designated seat capacity "2 through 5". The load on the tyres should not exceed 85% of the load carrying capacity corresponding to the Load Index marked on the tyre.

The "*Normal occupant mass*" is the mass of 68 kg multiplied by the Vehicle normal load number of occupants (driver included) distibuted as specified in the table following. When local regulations include a luggage mass located in the luggage compartment, a mass of 7 kg per occupant shall be added.

	Number of occupants	
Designated Seating Capacity	2 through 4	5 and above
Vehicle Normal Load	2	3
Occupant distribution in a 'normally loaded' vehicle	2 in front	2 in front 1 in second row
Note: "Occupants" means Passenger + driver.		

ATTACHMENTS 4 – 10

CONFIDENTIAL BUSINESS INFORMATION

SUBMITTED TO OFFICE OF CHIEF COUNSEL WITH PART 512 REQUEST FOR CONFIDENTIAL TREATMENT

PIRELLI TIRE LLC

COPY OF
PART 573
NON-COMPLIANCE REPORT

Tire Report

NHTSA ID: 19T002 Transaction ID: 19-001035-21892-11 (Amendment 1)

Required fields indicated with *

− Manufacturer: Pirelli Tire LLC

100 Pirelli Drive
Rome GA 30161

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

− Tire Information

− Pirelli P7 Cinturato 245/45R18 100 Y

* **Tire Brand:** Pirelli
* **Tire Line:** P7 Cinturato
* **Tire Size:** 245/45R18 100 Y

Production Dates Begin: 04/03/2017
End: 02/15/2019

Descriptive Information:
245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT radial tires, original equipment and replacement. The original equipment tires were installed on certain Mercedes-Benz E-Class passenger cars exported to the U.S. by Daimler (422 tires installed on 211 vehicles). The replacement tires were imported into the U.S. by Pirelli Tire LLC (1,601 tires, based upon a review of distribution records, net of re-exported tires).

Tire Identification Number (TIN)

* Plant ID code:	* Size code:	Optional code:	* Beg. Date Code:	* End. Date Code:
4J	T791	1417	0619	93

Number potentially involved: 2023 **Estimated percentage of involved with defect:** 100%

− Defect / Noncompliance Description

For this Defect/Noncompliance:

*** Describe the defect or noncompliance:**
The tire was marked as having a maximum permissible inflation pressure of 340 kPa, although the tire was designed and engineered as having a maximum inflation pressure of 350 kPa for which the tire complies with regulatory requirements. Accordingly, these tires do not comply with FMVSS 139, S5.5(c), which requires that the tire be marked with the maximum permissible inflation pressure for this tire. As a consequence of this unintended reduction of the labeled maximum inflation pressure, the tires fall subject to a different strength test prescription under FMVSS 109/139, which these tires were not meant to satisfy. The tires meet all applicable minimum performance requirements and other labeling requirements for tires with a maximum permissible inflation pressure of 350 kPa.

If a noncompliance, provide the applicable FMVSS:
139 - New pneumatic radial tires for light vehicles

If applicable, provide any further FMVSS affected:

Describe the cause:
The subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked accordingly.

*** Describe the safety risk:**
Pirelli has not identified a safety risk with respect to these tires and intends to submit a petition for determination of inconsequential noncompliance for the subject tires.

Identify any warning which can precede or occur:

This Recall affects all vehicles.

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 Information

Company Name:

Country:

Company Contact Information

First Name:

Last Name:

Address 1:
Address 2:
City:
State:
Zip/Postal Code:

Position:
Email:
Phone:

− Purchaser Information

Company: Mercedes-Benz USA, LLC
Country: United States
Address 1: 13470 International Parkway
Address 2: HPC 171
City: Jacksonville
State: FLORIDA
Zip/Postal Code: 32218

First Name: Gregory
Last Name: Gunther
Position:
Email: gregory.gunther@mbusa.com
Phone:

− Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:
On February 7, 2019: Pirelli Tire LLC was advised by Pirelli Deutschland GMBH that it was investigating an informal report from an OEM customer, Daimler, that the Korea Automobile Testing & Research Institute (KATRI) allegedly tested the subject tire, 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT tire (fitted onto a Daimler vehicle) and that the tire reportedly did not meet the plunger test specification under KSM 6750 applicable to this tire as labeled. February 7 - 14, 2019: Pirelli Deutschland GMBH continued to investigate the matter, including review of 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT production and shipping records in preparation for discussion with KATRI representatives. February 14, 2019: Representatives from Pirelli Deutschland GMBH and Daimler met with KATRI in Korea to discuss KATRI's test methodology. February 15, 2019: Pirelli's investigation concluded that the subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked accordingly. Based upon the results of this investigation, Pirelli management determined that the labeling error had the effect of rendering the subject tires partially noncompliant with FMVSS 139. The tires meet all applicable performance standard and other labeling requirements for tires with a maximum permissible inflation pressure of 350 kPa. Pirelli is not aware of any failures, accidents or injuries related to this labeling error.

− Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.
Pirelli intends to submit a petition under 49 CFR Part 556 seeking an exemption from the notification and recall requirements of the Safety Act on the grounds that the noncompliance is inconsequential to motor vehicle safety.

Describe what distinguishes the remedy component from the recalled component.
Pirelli intends to submit a petition under 49 CFR Part 556 seeking an exemption from the notification and recall requirements of the Safety Act on the grounds that the noncompliance is inconsequential to motor vehicle safety.

Identify and describe how and when the recall condition was corrected in production.
Pirelli has ceased production of the affected tire. Production of a replacement tire labeled with the maximum permissible inflation pressure of 350 kPa will commence at the latest in two weeks.

− Identify the Recall Schedule

Describe the recall schedule for notifications.:
Pirelli intends to submit a petition under 49 CFR Part 556 seeking an exemption from the notification and recall requirements of the Safety Act on the grounds that the noncompliance is inconsequential to motor vehicle safety.

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

Planned Dealer Notification Begin Date:
Planned Dealer Notification End Date:
Planned Owner Notification Begin Date:
Planned Owner Notification End Date:

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 19T-002

Manufacturer Name : Pirelli Tire LLC
Submission Date : MAR 15, 2019
NHTSA Recall No. : 19T-002
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Pirelli Tire LLC
Address : 100 Pirelli Drive
P.O. Box 700 Rome GA 30161
Company phone : 7063685800

Population :

Number of potentially involved : 2,023
Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : Pirelli
Tire Line : P7 Cinturato
Tire Size : 245/45R18 100 Y
Descriptive Information : 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT radial tires, original equipment and replacement. The original equipment tires were installed on certain Mercedes-Benz E-Class passenger cars exported to the U.S. by Daimler (422 tires installed on 211 vehicles). The replacement tires were imported into the U.S. by Pirelli Tire LLC (1,601 tires, based upon a review of distribution records, net of re-exported tires).
Production Dates : APR 03, 2017 - FEB 15, 2019

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
93	4J	T791	1417	0619

Description of Noncompliance :

Description of the Noncompliance : The tire was marked as having a maximum permissible inflation pressure of 340 kPa, although the tire was designed and engineered as having a maximum inflation pressure of 350 kPa for which the tire complies with regulatory requirements. Accordingly, these tires do not comply with FMVSS 139, S5.5(c), which requires that the tire be marked with the maximum permissible inflation pressure for this tire. As a consequence of this unintended reduction of the labeled maximum inflation pressure, the tires fall subject to a different strength test prescription under FMVSS 109/139, which these tires were not meant to satisfy. The tires meet all applicable minimum performance requirements and other labeling requirements for tires with a maximum permissible inflation pressure of 350 kPa.

FMVSS 1 : 139 - New pneumatic radial tires for light vehicles

FMVSS 2 :	NR
Description of the Safety Risk :	Pirelli has not identified a safety risk with respect to these tires and intends to submit a petition for determination of inconsequential noncompliance for the subject tires.
Description of the Cause :	The subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked accordingly.
Identification of Any Warning that can Occur :	NR

Supplier Identification :

Component Manufacturer

Name :	NR
Address :	NR
	NR
Country :	NR

Chronology :

On February 7, 2019: Pirelli Tire LLC was advised by Pirelli Deutschland GMBH that it was investigating an informal report from an OEM customer, Daimler, that the Korea Automobile Testing & Research Institute (KATRI) allegedly tested the subject tire, 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT tire (fitted onto a Daimler vehicle) and that the tire reportedly did not meet the plunger test specification under KSM 6750 applicable to this tire as labeled.

February 7 - 14, 2019: Pirelli Deutschland GMBH continued to investigate the matter, including review of 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT production and shipping records in preparation for discussion with KATRI representatives.

February 14, 2019: Representatives from Pirelli Deutschland GMBH and Daimler met with KATRI in Korea to discuss KATRI's test methodology.

February 15, 2019: Pirelli's investigation concluded that the subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked accordingly. Based upon the results of this investigation, Pirelli management determined that the labeling error had the effect of rendering the subject tires partially noncompliant with FMVSS 139. The tires meet all applicable performance standard and other labeling requirements for tires with a maximum permissible inflation pressure of 350 kPa.

Pirelli is not aware of any failures, accidents or injuries related to this labeling error.

Description of Remedy :

Description of Remedy Program :	Pirelli intends to submit a petition under 49 CFR Part 556 seeking an exemption from the notification and recall requirements of the Safety Act on the grounds that the noncompliance is inconsequential to motor vehicle safety.
How Remedy Component Differs from Recalled Component :	Pirelli intends to submit a petition under 49 CFR Part 556 seeking an exemption from the notification and recall requirements of the Safety Act on the grounds that the noncompliance is inconsequential to motor vehicle safety.
Identify How/When Recall Condition was Corrected in Production :	Pirelli has ceased production of the affected tire. Production of a replacement tire labeled with the maximum permissible inflation pressure of 350 kPa will commence at the latest in two weeks.

Recall Schedule :

Description of Recall Schedule :	Pirelli intends to submit a petition under 49 CFR Part 556 seeking an exemption from the notification and recall requirements of the Safety Act on the grounds that the noncompliance is inconsequential to motor vehicle safety.
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 :	Mercedes-Benz USA, LLC
Address :	13470 International Parkway HPC 171 Jacksonville FL 32218
Country :	US
Company Phone :	NR

* NR - Not Reported