



**Kia Motors America, Inc.**  
**Corporate Headquarters**

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April 18, 2019

**VIA FEDERAL EXPRESS**

Heidi King  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Ave., S.E.  
Washington, DC 20590

Re: Petition for Inconsequential Noncompliance Pursuant to 49 C.F.R. Part 556  
2020 Kia Telluride; FMVSS No. 110 Certification Label Noncompliance

Dear Ms. King:

On April 12, 2019, Kia Motors America, Inc. ("KMA") notified the National Highway Traffic Safety Administration ("NHTSA") pursuant to 49 C.F.R. Part 573, of noncompliance with Federal Motor Vehicle Safety Standard ("FMVSS") No. 110, "Tire Selection and Rims" with respect to the certification label on approximately 8,773 model year 2020 Kia Telluride vehicles that were manufactured at Kia Motors Manufacturing Georgia, Inc. ("KMMG") from January 15, 2019 through March 27, 2019. A copy of the 573 report is attached as Exhibit A.

On behalf of KMA<sup>1</sup> and Kia Motors Corporation (collectively "Kia"), KMA submits the following Petition for Inconsequential Noncompliance pursuant to 49 C.F.R. Part 556. As set forth below, this petition seeks an exemption from the notice and remedy requirements of 49 U.S.C. Chapter 301 on the basis that the noncompliance is inconsequential to motor vehicle safety.

**Background / Description of Noncompliance**

FMVSS 110 requires additional labeling information for vehicles other than passenger cars, i.e. multipurpose vehicles. 49 C.F.R. §571.110 S4.3.3 requires that each vehicle show the size designation of the vehicle rims appropriate for the tire appropriate for use on that vehicle, including the tire installed as original equipment on the vehicle by the vehicle manufacturer, after each GAWR listed on the Part 567 certification label.

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<sup>1</sup> KMA is a corporation organized under the laws of California. It is located at 111 Peters Canyon Road, Irvine, CA 92606.

The affected 2020 Telluride vehicles are equipped with 7.5J x 20 or 7.5J x 18 wheel rims. The Part 567 certification labels on these vehicles are missing a value for the rim size. Specifically, “20” or “18” is missing after “7.5J x” and thus the labels do not fully comply with the requirements of FMVSS 110 S.4.3.3. The labels also contain a minor typo, i.e., the “i” in “psi” is omitted in the section of the label identifying the corresponding tire pressure.

Corrected certification labels were introduced into production at KMMG on March 25, 2019 such that all future production vehicles will comply with FMVSS 110 S4.3.3.

### **The Noncompliance is Inconsequential to Motor Vehicle Safety**

These minor omissions do not have any adverse safety implications because the information is readily available from other sources.

#### 1. FMVSS 110 Tire & Loading Label

FMVSS 110 S4.3(d) requires the tire and loading information placard state the tire size designation for the tires installed on the vehicle at the time of first purchase. On the affected vehicles, the FMVSS 110 tire and loading label (which is located directly adjacent to the certification label on the “B” pillar), contains the correct tire size dimensions, recommended cold tire inflation pressure, and vehicle capacity weight.



#### 2. Owner's Manual

FMVSS 110 S4.3(f) also requires the tire and loading placard to state “See Owner’s Manual for Additional Information.” (See above photos). The Owner’s Manual for the 2020 Telluride provides the following wheel rim and tire information, which the owner can easily refer to in order to confirm the correct tire pressure:

**Specifications, Consumer information and Reporting safety defects** **Tires and wheels**

**Tires and wheels**

Item	Tire size	Whe el size	Supplier	Load Capacity		Speed capability	Inflation pressure (psi (kPa))				Wheel lug nut torque (ft. lbf (N.m))	
				L <sup>1</sup>	kg		SS <sup>2</sup>	km/h	Front	Rear		Front
Full size tire	245/60 R18	7.5JX 18	Michelin Pirelli	105	925	H	210	35 (240)	35 (240)	35 (240)	35 (240)	79 - 94 (11-13, 107 - 127)
	245/50 R20	7.5JX 20	Michelin Pirelli	102	850	V	240	35 (240)	35 (240)	35 (240)	35 (240)	
Compact Spare tire	T155/ 90 R18	4.0T X18	Kumho	113	1,150	M	130	60 (420)	60 (420)	60 (420)	60 (420)	

\*1. Normal load - Up to 3 persons  
 \*2. Load Index  
 \*3. Speed Symbol

**\* NOTICE**

- We recommend that when replacing tires, use the same originally supplied with the vehicles. If not, that affects driving performance.
- When driving in high altitude grades, it is natural for the atmospheric pressure to decrease. Therefore, please check the tire pressure and add more air when necessary. Additionally required tire air pressure per km above sea level: 1.5 psi(10.5 kPa)/km

**▲ CAUTION**

When replacing tires, use the same size originally supplied with the vehicle. Using tires of a different size can damage the related parts or make it work irregularly.

### 3. Installed Wheels

The consumer can also check the tire rims installed on the vehicle to determine wheel rim size. FMVSS 110 S.4.4.2(b) requires each rim to identify the rim size designation. As shown below, the affected vehicles meet the requirements of this section:



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#### 4. Field Experience

Kia is not aware of any accidents or injuries related to the omitted tire rim size information or typo regarding "psi" on the certification label, nor has it received contact from vehicle owners regarding this issue.

#### 5. Grants of Similar Petitions

NHTSA has previously granted similar petitions for inconsequential noncompliance with FMVSS 110 S4.3.3 with respect to missing or incorrect information on the certification label. See e.g., *Hyundai-Kia America Technical Center, Inc., Grant of Petition for Decision of Inconsequential Noncompliance*, 78 FR 38445 (June 26, 2013) [granting petition where certification labels in certain 2012MY Hyundai Veracruz vehicles were missing tire size designation information entirely]; *Chrysler Group, LLC, Grant of Petition for Decision of Inconsequential Noncompliance*, 78 FR 38443 (June 26, 2013) [granting petition where certification labels in certain 2011MY Chrysler Town and Country and Dodge Grand Caravan vehicles incorrectly identified tire size]; and *BMW of North America, LLC, Grant of Petition for Decision of Inconsequential Noncompliance*, 78 FR 76408 (Dec. 17, 2013) [granting petition where certification labels in certain 2012MY X3 SAV vehicles contained incorrect tire and rim information for the tires and rims installed as original equipment].

#### Conclusion

For the reasons set forth above, Kia believes that the noncompliance is inconsequential as it relates to motor vehicle safety. Kia should therefore be exempt from the recall notification and remedy provisions of the Motor Vehicle Safety Act with respect to the noncompliance.

Sincerely,



J.S. (Jurassic) Park  
Vice President, Product Litigation &  
Regulatory Compliance  
Kia Motors America, Inc.

4/12/2019

Vehicle Report | Recalls Management Portal



Kia Motors America

**Vehicle Report**

Transaction ID: 19-00753-22151-10 (Original Report)

Required fields indicated with \*

Your report has been submitted. Your Transaction No. is 19-00753-22151-10.

**Manufacturer: Kia Motors America**

111 Peters Canyon Road  
Irvine CA 92606

J.S. (Jurassic) Park VP/PL & Regulatory Compliance  
949-468-4731,

This is a Noncompliance Report.

**Vehicle Information**

**Kia Telluride 2020**

\* Model Yr. Start: 2020      \* Model Yr. End: 2020      Type: LIGHT VEHICLES  
\* Make: Kia      Body Style: ALL  
\* Model: Telluride      Powertrain: GAS

**Production Dates**      Begin: 01/10/2019  
End: 03/27/2019

**Descriptive Information:**  
Some 2020 MY Telluride vehicles manufactured by Kia Motors Manufacturing Georgia, Inc. (KMMG) from January 10, 2019 through March 27, 2019. The Part 567 certification label does not conform to the requirements of § 571.110 S4.3.3. The recall population was determined by a review of vehicle production records. Vehicles were not produced in VIN order.

**VIN Range(s):**      Begin:      End:

Number potentially involved: 8773

Estimated percentage of involved with defect: 100%

**Defect / Noncompliance Description**

For this Defect/Noncompliance:

**\* Describe the defect or noncompliance:**  
The Part 567 certification label does not conform to the requirements of § 571.110 S4.3.3, which requires the rim type designation appropriate for use on the vehicle, including the tire installed as original equipment, to be stated after the GAWR. On the affected vehicles, the certification label is missing a value for the rim size. The certification label also contains a typo, which inadvertently omits the "l" in "psi" in the section of the label identifying tire pressure.

**\* Describe the safety risk:**  
The corresponding FMVSS 110 label on the affected vehicles corresponds to the tires installed as original equipment and provides the tire size, tire pressure and vehicle capacity weight. Thus, there is no risk to motor vehicle safety.

**If a noncompliance, provide the applicable FMVSS:**  
110 - Tire selection and rims

**Identify any warning which can precede or occur:**  
N/A

**If applicable, provide any further FMVSS affected:**

**Describe the cause:**  
Information incorrectly inputted into printing machine resulting in missing information

**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:** N/A  
**Country:**  
**Address 1:** N/A  
**Address 2:** N/A  
**City:** N/A

Company Contact Information

**First Name:** N/A  
**Last Name:** N/A  
**Position:** N/A  
**Email:**  
**Phone:**

4/12/2019

Vehicle Report | Recalls Management Portal

State:  
 Zip/Postal Code: N/A

**Chronology of Defect / Noncompliance Determination**

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:  
 See attached document titled "2020 Telluride Certification Label Chronology"

**Identify the Remedy**

**Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.**  
 Kia intends to file a Petition for Inconsequential Noncompliance in accordance with the provisions of Part 556 on the basis that the noncompliance is inconsequential as it relates to motor vehicle safety.

**Describe what distinguishes the remedy component from the recalled component.**  
 N/A

**Identify and describe how and when the recall condition was corrected in production.**  
 Corrected certification labels were introduced into production at KMMG on March 25, 2019.

**Identify the Recall Schedule**

**Describe the recall schedule for notifications.:**  
 N/A

**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):** SC178

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**

See attached "2020 Telluride Certification Label Chronology". Kia intends to file a Petition for Inconsequential Noncompliance in accordance with the provisions of Part 556.

**Document Upload**

There are 0 documents associated with this report.

1200 New Jersey Avenue, SE, West Building Washington DC 20590 USA 1.888.327.4236 TTY 1.800.424.9153  
 This application works best in IE9 and above and recent versions of Firefox, Chrome and Safari

**2020 Telluride Certification Label Chronology  
Basis of Non-Compliance Determination 573.6(c)(6)**

April 3, 2019	Kia Motors America, Inc. (KMA) informed by Hyundai-Kia America Technical Center, Inc. (HATCI) of missing information and typographical error on certification label on certain 2020 Telluride vehicles produced at Kia Motors Manufacturing Georgia (KMMG).
April 4-9, 2019	KMA requests information from KMMG pertaining to issue and conducts internal evaluation of potential non-compliance issue. KMA advises Kia Motors Corporation (KMC).
April 10, 2019	KMC determines that the affected vehicles do not conform to Section 4.3.3 of FMVSS 110. No customer complaints; no reported injuries or accidents.

# Part 573 Safety Recall Report

# 19V-301

**Manufacturer Name :** Kia Motors America**Submission Date :** APR 12, 2019**NHTSA Recall No. :** 19V-301**Manufacturer Recall No. :** SC178**Manufacturer Information :**

Manufacturer Name : Kia Motors America

Address : 111 Peters Canyon Road  
Irvine CA 92606

Company phone : 800-333-4542

**Population :**

Number of potentially involved : 8,773

Estimated percentage with defect : 100 %

**Vehicle Information :**

Vehicle 1 : 2020-2020 Kia Telluride

Vehicle Type : LIGHT VEHICLES

Body Style : ALL

Power Train : GAS

Descriptive Information : Some 2020 MY Telluride vehicles manufactured by Kia Motors Manufacturing Georgia, Inc. (KMMG) from January 10, 2019 through March 27, 2019.

The Part 567 certification label does not conform to the requirements of § 571.110 S4.3.3. The recall population was determined by a review of vehicle production records. Vehicles were not produced in VIN order.

Production Dates : JAN 10, 2019 - MAR 27, 2019

VIN Range 1 : Begin :

NR

End : NR

 Not sequential**Description of Noncompliance :**

Description of the Noncompliance : The Part 567 certification label does not conform to the requirements of § 571.110 S4.3.3, which requires the rim type designation appropriate for use on the vehicle, including the tire installed as original equipment, to be stated after the GAWR. On the affected vehicles, the certification label is missing a value for the rim size. The certification label also contains a typo, which inadvertently omits the "i" in "psi" in the section of the label identifying tire pressure.

FMVSS 1 : 110 - Tire selection and rims

FMVSS 2 : NR

Description of the Safety Risk : The corresponding FMVSS 110 label on the affected vehicles corresponds to the tires installed as original equipment and provides the tire size, tire pressure and vehicle capacity weight. Thus, there is no risk to motor vehicle safety.

Description of the Cause : Information incorrectly inputted into printing machine resulting in missing information

Identification of Any Warning that can Occur : N/A

## Supplier Identification :

### Component Manufacturer

Name : N/A

Address : N/A

N/A N/A N/A

Country : NR

## Chronology :

See attached document titled "2020 Telluride Certification Label Chronology"

## Description of Remedy :

Description of Remedy Program : Kia intends to file a Petition for Inconsequential Noncompliance in accordance with the provisions of Part 556 on the basis that the noncompliance is inconsequential as it relates to motor vehicle safety.

How Remedy Component Differs from Recalled Component : N/A

Identify How/When Recall Condition was Corrected in Production : Corrected certification labels were introduced into production at KMMG on March 25, 2019.

## Recall Schedule :

Description of Recall Schedule : N/A

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

\* NR - Not Reported