

The Goodyear Tire & Rubber Company
Akron, Ohio 44316 - 0001

November 25, 2019

Mailed Via FEDEX on 11/26/2019

Mr. James Owens
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Petition for Exemption-Inconsequential Noncompliance
49CFR§571.119 S6.5(f)

Dear Mr. Owens,

The Goodyear Tire & Rubber Company (Goodyear), a corporation of the State of Ohio with its principal address at 200 Innovation Way, Akron, Ohio 44316-0001 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.

This petition concerns 76 Kelly Armorsteel KDM 1 11/R22.5 LRH commercial truck tires which may contain an irregular date code in the Tire Identification Number (TIN). These tires were manufactured in the 34th week of 2019 using a date code stencil that was engraved to less than 0.51 mm (0.020 inches), making them noncompliant with the tire marking requirements found in 49 CFR 574.5. The tires are engraved MJ3TK2BW3419. The date code portion, the 3419, is not raised to the minimum required level of 0.51 mm (0.020 inches). (See picture below).



Goodyear believes this noncompliance is inconsequential to motor vehicle safety because these tires were manufactured as designed and meet or exceed all applicable Federal Motor Vehicle Safety standards. All of the sidewall markings related to tire service (load capacity, corresponding inflation pressure, etc.) are correct. The irregular date code is not a safety concern and also has no impact on the retreading, repairing and recycling industries. The affected date code stencil has been corrected and all future production will not contain the irregularity in the date code.

The date code portion of the TIN becomes important in the event of a safety campaign so that the consumer may properly identify the recalled tire(s). In the unlikely event that a safety campaign would ever become necessary for this Kelly Armorsteel KDM 1 11/R22.5 LRH commercial truck tire made in the 34th week of 2019, Goodyear would include in the listing of recalled TINs the TIN for these tires with the date code portion as shown, MJ3TK2BW3419, as well as the TIN for these tires with the date code portion shown with the date code portion of the TIN below the regulation specified height so that the consumer would know that tires with this TIN, MJ3TK2BW, are included in the recall even if they have difficulty reading the date code portion because it is not raised to the 0.51 mm level.

As required by 49 CFR 556.4(b) (6), three copies of the previously filed noncompliance report are also attached.

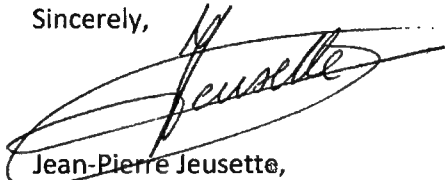
Please contact Mark Cherveney if you have any questions regarding this request.

Office phone: (330) 796-3519

Cell Phone: (330) 760-3674

Email: mark.cherveney@goodyear.com

Sincerely,

A handwritten signature in black ink, appearing to read "Jeusette", is written over a large, loopy scribble that also contains the name "Jeusette".

Jean-Pierre Jeusette,
Global Vice-President Quality

Attachments

Tire Report

Transaction ID: 19-00567-23550-11 (Amendment 1)

Required fields indicated with *

Manufacturer: Goodyear Tire & Rubber Company	
200 Innovation Way Akron OH 44316	Mark Cherveney, Mgr Global Reg's/Compliance 330-796-3519,

This is a Noncompliance Report. Filing a petition pursuant to [49 CFR 556](#)

Tire Information					
Kelly Armorsteel KDM I 11R22.5					
* Tire Brand: Kelly	Descriptive Information:				
* Tire Line: Armorsteel KDM I	The subject noncompliant tires were restricted to tires cured in one production mold in one week. When the date code portion of the Tire Identification Number (TIN) was changed in that one mold for date code 3419, a date code stencil that was engraved to less than minimum of 0.51 mm (0.020 inch) was installed. An inventory review indicated 76 tires may have left Goodyear's control. Tires cured in other tire production molds during date code 3419 were checked and found compliant.				
* Tire Size: 11R22.5					
Production Dates	Begin:	08/25/2019			
	End:	08/31/2019			
<i>Tire Identification Number (TIN)</i>					
* Plant ID code:	* Size code:	Optional code:	* Beg. Date Code:	* End. Date Code:	MJ
3T	K2BW	3419	3419		

Number potentially involved: 76

Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description	
For this Defect/Noncompliance:	
<p>* Describe the defect or noncompliance: The noncompliance for the subject tires is that the date code portion of the TIN is raised above the surface of the tire less than the specified 0.51 mm (0.020 inch) as prescribed in FMVSS §571.119 Tire Markings: S6.5 Tire markings. Except as specified in this paragraph, each tire shall be marked on each sidewall with the information specified in paragraphs (a) through (j) of this section. The markings shall be placed between the maximum section width (exclusive of sidewall decorations or curb ribs) and the bead on at least one sidewall, unless the maximum section width of the tire is located in an area which is not more than one-fourth of the distance from the bead to the shoulder of the tire. If the maximum section width falls within that area, the markings shall appear between the bead and a point one-half the distance from the bead to the shoulder of the tire, on at least one sidewall. The markings shall be in letters and numerals not less than 2 mm (0.078 inch) high and raised above or sunk below the tire surface not less than 0.4 mm (0.015 inch), except that the marking depth shall be not less than 0.25mm (0.010 inch) in the case of motorcycle tires. The tire identification and the DOT symbol labeling shall comply with part 574 of this chapter.</p> <p>If a noncompliance, provide the applicable FMVSS: 119 - New pneumatic tires- other than passenger cars</p> <p>If applicable, provide any further FMVSS affected:</p> <p>Describe the cause: A malfunction of a CNC milling machine resulted in one TIN date code stencil being engraved to a depth less than the required minimum 0.51 mm (0.020 inch). That stencil was then placed in one curing mold.</p>	<p>* Describe the safety risk: The condition does not pose an unreasonable risk to motor vehicle safety and we will be petitioning the noncompliance as inconsequential to motor vehicle safety.</p> <p>Identify any warning which can precede or occur: Not Applicable</p>
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 Contact Information
Company Name:	First Name:

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

Last Name:
Position:
Email:
Phone:

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.:

• 11/07/19: Government Compliance team was notified that approximately eight tires of code 3TK2B were presented for warranty adjustment with an irregular (i.e. shallow embossing) date code portion of the Tire Identification Number (TIN). Based on review of a picture, the date code was readable, but not as pronounced as normal. Team requested that one of the tires be shipped to Akron for analysis. • 11/19/19: Tire received in Akron. • 11/20/19: Tire inspected and measurements conducted which confirmed that the date code portion of the TIN was not raised above the surface at least 0.51 mm. • 11/21/19: Team determined that 76 tires of code 3TK2B cured in one mold in week 3419 which may contain the irregular date code portion of the TIN are not in Goodyear's possession or control.

Identify the Remedy

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

Describe what distinguishes the remedy component from the recalled component.

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

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

19T-022

Manufacturer Name : Goodyear Tire & Rubber Company**Submission Date :** NOV 26, 2019**NHTSA Recall No. :** 19T-022**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : Goodyear Tire & Rubber Company

Address : 200 Innovation Way

Akron OH 44316

Company phone : 330-796-2121

Population :

Number of potentially involved : 76

Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : Kelly

Tire Line : Armorsteel KDM I

Tire Size : 11R22.5

Descriptive Information : The subject noncompliant tires were restricted to tires cured in one production mold in one week. When the date code portion of the Tire Identification Number (TIN) was changed in that one mold for date code 3419, a date code stencil that was engraved to less than minimum of 0.51 mm (0.020 inch) was installed. An inventory review indicated 76 tires may have left Goodyear's control. Tires cured in other tire production molds during date code 3419 were checked and found compliant.

Production Dates : AUG 25, 2019 - AUG 31, 2019

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
MJ	3T	K2BW	3419	3419

Description of Noncompliance :

Description of the Noncompliance : The noncompliance for the subject tires is that the date code portion of the TIN is raised above the surface of the tire less than the specified 0.51 mm (0.020 inch) as prescribed in FMVSS §571.119 Tire Markings:
S6.5 Tire markings. Except as specified in this paragraph, each tire shall be marked on each sidewall with the information specified in paragraphs (a) through (j) of this section. The markings shall be placed between the maximum section width (exclusive of sidewall decorations or curb ribs) and the bead on at least one sidewall, unless the maximum section width of the tire is located in an area which is not more than one-fourth of the distance from the bead to the shoulder of the tire. If the maximum section width falls within that area, the markings shall appear between the bead and a point one-half the distance from the bead to the shoulder of the tire, on at least one sidewall. The markings shall be in letters and numerals not less than 2 mm (0.078 inch) high and raised above or sunk below the tire surface not less than 0.4 mm (0.015 inch), except that the marking depth shall be not less than 0.25mm (0.010 inch) in the case of motorcycle tires. The tire identification and the DOT symbol labeling shall comply with part 574 of this chapter.

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

FMVSS 2 : NR

Description of the Safety Risk : The condition does not pose an unreasonable risk to motor vehicle safety and we will be petitioning the noncompliance as inconsequential to motor vehicle safety.

Description of the Cause : A malfunction of a CNC milling machine resulted in one TIN date code stencil being engraved to a depth less than the required minimum 0.51 mm (0.020 inch). That stencil was then placed in one curing mold.

Identification of Any Warning that can Occur : Not Applicable

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

- 11/07/19: Government Compliance team was notified that approximately eight tires of code 3TK2B were presented for warranty adjustment with an irregular (i.e. shallow embossing) date code portion of the

Tire Identification Number (TIN). Based on review of a picture, the date code was readable, but not as pronounced as normal. Team requested that one of the tires be shipped to Akron for analysis.

- 11/19/19: Tire received in Akron.
- 11/20/19: Tire inspected and measurements conducted which confirmed that the date code portion of the TIN was not raised above the surface at least 0.51 mm.
- 11/21/19: Team determined that 76 tires of code 3TK2B cured in one mold in week 3419 which may contain the irregular date code portion of the TIN are not in Goodyear's possession or control.

Description of Remedy :

Description of Remedy Program : NR

How Remedy Component Differs
from Recalled Component : NR

Identify How/When Recall Condition
was Corrected in Production : NR

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