

EXECUTIVE SECRETARIAT
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Transamerica Tire Co. Ltd.

Derek Zhang
3181 Poplar Ave.
Memphis, TN 38111
P: 702-576-1651
E: derek@transamericatire.com

November 25, 2019

VIA FEDERAL EXPRESS

James C. Owens
Deputy Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Transamerica Tire Co. Ltd. – Petition for Inconsequential Noncompliance

Dear Deputy Administrator Owens,

Transamerica Tire Co. Ltd. (“Transamerica”) is submitting this Petition for Inconsequential Noncompliance (“Petition”) in accordance with 49 U.S.C. §§ 30118, 30120 and 49 C.F.R. Part 556. On November 21, 2019, Transamerica submitted a noncompliance report pursuant to 49 C.F.R. Part 573 (“Part 573 Report”) which explained that certain tires manufactured by Shandong Yinbao Tyre Group (“Yinbao”) and imported by Transamerica were equipped with inaccurate Tire Identification Number (“TIN”). Although these tires adhere to all the performance requirements set forth under Federal Motor Vehicle Safety Standard (“FMVSS”) No. 119, they do not fully conform to the tire marking requirements under FMVSS No. 119 and 49 C.F.R. Part 574. The Part 573 Report provides additional details regarding this noncompliance, including the population and production dates of the affected tires. A copy of the Part 573 Report is included herewith as Attachment A.

I. FACTUAL AND REGULATORY BACKGROUND

Transamerica is a tire importer and distributor, as opposed to a manufacturer, of private brand tires offering a complete line of products for a variety of applications, including summer & winter passenger, mud terrain, truck, trailer and specialty tires. Private brands offered by Transamerica include Venom Power, Transeagle and Freedom Hauler. For reference, Transamerica’s corporate address is 3181 Poplar Ave. Ste. 218, Memphis, Tennessee, 38111-3524, and Transamerica is organized under the laws of the State of California.

The noncompliance in this matter relates to FMVSS No. 119. FMVSS No. 119 sets forth requirements for tire markings, including TIN containing information provided under 49 C.F.R. Part

574.¹ NHTSA has explained that the intent of TIN requirements “is to facilitate efforts by tire manufacturers to notify purchasers of defective or nonconforming tires and by such purchasers to identify those tires so that purchasers can take appropriate action in the interest of motor vehicle safety.”²

Pursuant to the TIN requirements set forth under 49 C.F.R. Part 574, tire manufacturers are required to conspicuously label “on one sidewall of each tire it manufactures ... by permanently molding into or onto the sidewall ... a TIN consisting of 13 symbols and containing the information set forth in paragraphs (b)(1) through (b)(3) of this section.”³ Specifically, TIN contains information on the plant code, the manufacturer’s code, and the date code of a tire.⁴ The manufacturer’s code consists of six symbols which are used “as a descriptive code for the purpose of identifying significant characteristics of the tire or to identify the brand name owner.”⁵

On October 21, 2019, Transamerica received a letter from NHTSA explaining that NHTSA’s Office of Vehicle Safety Compliance “has received information alleging that at least one of the tires manufactured by [Yinbao] and imported by [Transamerica] may not be in compliance with [FMVSS] No. 119.”⁶ Accordingly, the letter included a “photo showing a labeling failure on the tires branded Transeagle ST radial size 235/85R16.”⁷ Specifically, it is alleged that “[t]he tires appear to have an improper 14 character [TIN] instead of the 13 character TIN required by FMVSS No. 119.”⁸ Transamerica’s recall shortly followed.

II. DESCRIPTION OF THE NONCOMPLIANCE

Upon the receipt of the NHTA’s inquiry, Transamerica conducted an investigation to determine the validity of the allegations and the universe of tires affected by such noncompliance. Accordingly, Transamerica found that a total number of 9551 tires branded Transeagle ST radial size 235/85R16, 235/80R16, and 225/90R16 (collectively referred to as “Transeagle ST Tires”) contained an incorrect manufacturer’s code in their TIN labels molded on the sidewall of the tires. The dates of production of these tires is between September 23, 2017 and August 10, 2019. Specifically, as shown in NHTSA’s recent inquiry, the inaccurate TIN is shown as 1BP TTFEFTL on three sizes of Transeagle ST Tires, whereas the correct TIN for ST235/85R16 is 1BP TTFEFT, the correct TIN for ST235/80R16 is 1BP TFEFTL, and the correct TIN for ST225/90R16 is 1BP TTFEF. Transamerica also confirmed that, except for the incorrect manufacturer’s code, all other information labeled on the tires was correct, including the plant information and the date of production, and that Transeagle ST Tires otherwise comply with all applicable standards. Yinbao and Transamerica are not aware of any crashes, injuries, customer complaints or field reports in connection with this noncompliance.

¹ See 49 C.F.R. § 571.119 S6.5.

² See Certification; Federal Motor Vehicle Safety Standards; Tire Identification and Recordkeeping; Consumer Information Regulations, Advance Notice of Proposed Rulemaking, 65 Fed. Reg. 75,222, 75,224 (December 1, 2000).

³ See 49 C.F.R. 574.5(a).

⁴ See 49 C.F.R. 574.5(b).

⁵ See 49 C.F.R. 574.5(b)(2).

⁶ See NHTSA Letter dated October 21, 2019 and numbered NEF-220Adi OA-119-190806.

⁷ *Id.* at 1.

⁸ *Id.*

III. LEGAL STANDARDS APPLICABLE TO PETITIONS FOR INCONSEQUENTIAL NONCOMPLIANCE

NHTSA has determined that under the National Highway and Motor Vehicle Safety Act (“Safety Act”) and 49 C.F.R. Part 556, NHTSA may consider, in appropriate circumstances, whether an instance of noncompliance with a FMVSS is inconsequential to motor vehicle safety.⁹ Because neither the Safety Act nor 49 C.F.R. Part 556 define “inconsequential,” NHTSA has explained that “the agency determines whether a particular noncompliance is inconsequential to motor vehicle safety based upon the specific facts before it in a particular petition.”¹⁰ NHTSA has stated that a key question in evaluating a petition for inconsequential noncompliance is “whether the noncompliance in question is likely to increase the safety risk to individual occupants.”¹¹

In the case of labeling a tire with an inaccurate TIN, NHTSA has previously held that tires, “inboard sidewalls of [which were] labeled with an incorrect manufacturer’s identification mark,” were “inconsequential to motor vehicle safety.”¹² In so holding, NHTSA explained that “one measure of inconsequentiality to motor vehicle safety is that there is no effect of the noncompliance on the operational safety of the vehicles on which these tires are mounted.”¹³ NHTSA further explained that “it is also necessary that consumers be able to readily identify the tire manufacturer for safety reasons.”¹⁴ Furthermore, in a similar case where a tire was labeled with an inaccurate TIN information, NHTSA stated that “one measure of its inconsequentiality to motor vehicle safety is whether the mislabeling would affect the manufacturer’s or consumer’s ability to identify the mislabeled tired properly, should the tires be recalled for performance related noncompliance.”¹⁵

IV. BASIS FOR TRANSAMERICA’S PETITION FOR INCONSEQUENTIAL NONCOMPLIANCE

- 1. Because the Subject Tires Meet All Federal Motor Vehicle Safety and Performance Standards and the Noncompliance Is One of Labeling, and Because the Inaccurate Manufacturer’s Code Would Not Affect the Manufacturer’s or the Consumers’ Ability to Identify Them, Should the Tires Be Recalled For Performance Related Noncompliance, the Noncompliance Is Inconsequential.**

The sole noncompliance at issue relates to an inadvertently labeled manufacturer’s code in the TIN on certain tires. While the subject tires contain an improper manufacturer’s code, they are in all other respects properly labeled and meet all performance requirements under FMVSS. Inaccurate manufacturer’s code identification upon which a consumer would not reasonably be expected to rely, does not have any effect on the operational safety of the vehicles on which these tires are mounted.

⁹ See BMW of North America, LLC; Jaguar Land Rover North America, LLC; and Autoliv, Inc.; Decisions of Petitions for Inconsequential Noncompliance, 84 Fed. Reg. 19,994, 19,996 (May 7, 2019).

¹⁰ *Id.* at 19,997.

¹¹ *Id.*

¹² See Cooper Tire & Rubber Company, Grant of Petition for Decision of Inconsequential Noncompliance, 82 Fed. Reg. 52,966, 52,967 (November 15, 2017)

¹³ *Id.*

¹⁴ *Id.*

¹⁵ See Michelin North America, Inc., Grant of Petition for Decision of Inconsequential Noncompliance, 81 Fed. Reg. 76,412, 76,413 (November 2, 2016).

Furthermore, the inaccurate manufacturer's code identification will not affect Transamerica's, Yinbao's or consumers' ability to identify the subject tires, should they be recalled for performance related to noncompliance. First, the tires' TIN bears the correct plant's code and date code, and is still tied to Yinbao's manufacturing facility. Thus, Transamerica, Yinbao or the consumers would be reasonably able to identify the subject tires in the event of a recall. Second, Transamerica and Yinbao have taken measures to ensure that the tires can be registered correctly. Furthermore, Yinbao and Transamerica have already corrected the molds at the applicable manufacturing plant, such that no additional tires were fabricated with the noncompliance. Transamerica and Yinbao will ensure that the affected tires received as a result of a future recall will be recorded with the proper TIN number. Yinbao and Transamerica will also improve their internal processes to prevent future TIN errors, as appropriate.

In sum, because the inaccurate manufacturer's code in the TIN information does not affect operational safety of the vehicles, and because the mislabeling does not affect the manufacturer's or consumers' ability to identify the tires in the event of a recall for a performance related noncompliance, Transamerica and Yinbao's failure to provide the correct TIN information on the subject tires is inconsequential to motor vehicle safety.

2. NHTSA Has Previously Granted Petitions for Inconsequential Noncompliance Where TIN Information Labels Incorrect or Missing Information.

Granting this Petition would be consistent with NHTSA's prior decisions on petitions involving tires labeled with inaccurate TIN information. For example, in response to a reported noncompliance with an inaccurate TIN information, NHTSA held that tires labeled with incorrect date codes were inconsequential because "the mislabeling of the date code would not create confusion with manufacturers or consumers should there be a recall," as the manufacturer has taken certain measures to enable the correct registration of the affected tires.¹⁶ Furthermore, in a matter where TIN labels were missing the date code, NHTSA held that the noncompliance was inconsequential because "identifying the subject tires for any future recalls should not present a problem."¹⁷ Similarly, in response to a petition for inconsequential noncompliance with FMVSS No. 119, where tires were not marked appropriately with proper tire size codes, NHTSA held that the subject noncompliance was inconsequential because the missing information were available in other locations, the tires could be identified by "correctly stamped partial TIN on the sidewall" of the affected tires, and "[t]he subject noncompliance ... has no effect on the operational safety of vehicles on which these tires are mounted."¹⁸ In yet another similar instance, NHTSA determined that a noncompliance relating to tires molded with incorrect size designations were inconsequential because the accurate information was available on the sidewall markings of the tires, and the "incorrect marking does not affect the ability to identify the tires in the event of recall."¹⁹

¹⁶ See Michelin North America, Inc., Grant of Petition for Decision of Inconsequential Noncompliance, 81 Fed. Reg. 76,412, 76,413 (November 2, 2016).

¹⁷ See Cooper Tire & Rubber Company, Grant of Application for Decision of Inconsequential Noncompliance, 63 Fed. Reg. 29,059, 29,060 (May 27, 1998)

¹⁸ See Tireco, Inc., Grant of Petition for Decision of Inconsequential Noncompliance, 80 Fed. Reg. 66,614, 66,615 (October 29, 2015)

¹⁹ See Cooper Tire & Rubber Company, Grant of Petition for Decision of Inconsequential Noncompliance 71 Fed. Reg. 43,97 (January 26, 2006)

Finally, in connection with a petition very similar to this one, NHTSA found that tires labeled with incorrect manufacturer's plant code in the identification mark were inconsequential because the noncompliance did not have any effect on the operational safety, the tire manufacturer could easily be identified by the consumers for safety reasons, and the manufacturer took additional steps to ensure that the customers would be able to register their tires with incorrect manufacturer's code.²⁰

Here, the Transeagle ST Tires comply with all safety and performance standards, and the noncompliance does not have any effect on the operational safety of the vehicles they are mounted on. All other information labeled on the Transeagle ST Tires, including the plant code, the size information and the date code is accurate. Furthermore, Transamerica, Yinbao and the consumers would easily be able to identify the noncompliant Transeagle ST Tires, should there be a recall in a future date. Thus, Transamerica's petition for inconsequential noncompliance meets the criteria that NHTSA has previously held such petitions must meet in order to be granted.²¹

V. CONCLUSION

The incorrect manufacturer's code on the subject Transeagle ST Tires is unlikely to expose owners to any safety risk. The noncompliance does not have any effect on the operational safety of the vehicles on which these tires are mounted. The inaccurate manufacturer's code identification will not affect Transamerica's, Yinbao's or consumers' ability to identify the subject tires, should they be recalled for performance related to noncompliance. Transamerica is not aware of any customer complaints, crashes, accidents, or injuries associated with the noncompliance for which Transamerica is submitting this Petition.

For the reasons set forth above, pursuant to 49 C.F.R. 556, Transamerica respectfully requests relief from the owner and dealer notification requirements set forth in 49 C.F.R. 577. If you have any questions regarding this Petition, please do not hesitate to contact me at any time, either by e-mail at derek@transamericatire.com, or by phone at 702-576-1651.

Sincerely,



Derek Zhang
President
Transamerica Tire Co. Ltd.

²⁰ See Cooper Tire & Rubber Company, Grant of Petition for Decision of Inconsequential Noncompliance, 82 Fed. Reg. 52,966, 52,967 (November 15, 2017).

²¹ Petitioner is also aware that NHTSA recently granted another petition for decision of inconsequential noncompliance which was "due to a mold error in which one sidewall, of subject tires incorrectly state the ply rating, load range and load capacity as required by paragraph S6.5 (d) and (j) of FMVSS No. 119." See Yokohama Tire Corporation, Grant of Petition for Decision of Inconsequential Noncompliance, 84 Fed. Reg. 64,403 (November 21, 2019)

ATTACHMENT A
(Part 573 Noncompliance Report)

NHTSA ID: 19T021 Transaction ID: 19-0028069-23650-10 (Original Report)

Edit

Required fields have been programmatically identified as required and marked with an asterisk * before the field label. Required fields indicated with *

Manufacturer: Shandong Yinbao Tyre Group

Manufacturer Contact Address 3181 Poplar Ave.
Memphis TN 38111

Manufacturer Contact Name and Position Will Godfrey

Manufacturer Contact Phone 2022634119, Manufacturer Contact Email

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

Tire Information

[Collapse All Products within this section.](#) | [Expand All Products within this section.](#)

TRANSEAGLE ST ST235/85,80R16; ST225/90R16

Tire Brand:

TRANSEAGLE

Tire Line:

ST

Tire Size:

ST235/85,80R16; ST225/90R16

Production Dates

Begin: 09/23/2017

End: 08/10/2019

Descriptive Information:

The basis for determining the recall population was identified via the tire production information including date range for which the subject tires were identified to contain an inaccurate character sequence in the TIN. It has been determined that the subject tires only differ from other tires of the same brand and model line via the TIN. All physical, quality, performance and safety aspects of the tires are the same. The number of affected products is 9551.

Follow for visual view only

Tire Identification Number (TIN)

Plant ID code:

Size code:

Optional code:

Beg. Date Code:

End. Date Code:

Following are the TIN codes Plant ID code:

1BP

Size code:

TT

Optional code:

FEFT

Beg. Date Code:

4617

End. Date Code:

3219

Following are the TIN codes Plant ID code:

1BP

Size code:	TF
Optional code:	EFTL
Beg. Date Code:	3817
End. Date Code:	3219
Following are the TIN codesPlant ID code:	1BP
Size code:	TT
Optional code:	FEF
Beg. Date Code:	4818
End. Date Code:	5018

Number potentially involved: 9551
Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

Describe the defect or noncompliance:

A limited number of tires released in the US market was inadvertently labeled with an incorrect Tire Identification Number (TIN). FMVSS No. 119 and 49 CFR Part 574 require a 13 character TIN. A portion of the subject population, subject to this recall, contains an additional character to the end of the labeled TIN sequence for the manufacturer's code, therefore inadvertently producing a 14 total character TIN. The tire information is otherwise correct, as displayed via the first 13 characters. This includes the identification of manufacturer, tire size, type or any significant characteristics of the tire. Additionally, all the other sidewall markings related to operational performance and tire service, such as size, load capacity and the corresponding inflation pressure, are correct for continued safe operation. The mislabeling will not create confusion with the company, consumers or the agency in the event of further field actions, and the noncompliance has no effect on the operational safety of vehicles/trailers upon which the tires are mounted.

If a noncompliance, provide the applicable FMVSS:

119 - New pneumatic tires- other than passenger cars

If applicable, provide any further FMVSS affected:

Describe the cause:

An error in setting the die characters inadvertently occurred when during the molding of the Tire Identification Number (TIN). The inaccurate TIN for the subject tire, as shown in NHTSA's recent IR to the company, is shown as 1BP TTFEFTL. This inaccurate is shown on three sizes; (a) ST235/85R16, (b) ST235/80R16 and (c) ST225/90R16. But for an inadvertent die error, the correct TIN for tire size ST235/85R16 is 1BP TTFEFT. The correct tire size for ST235/80R16 is 1BP TFEFTL. And the correct tire for ST225/90R16 is 1BP TTFEF.

Describe the safety risk:

None. a.) The tires meet all applicable FMVSS 119 performance requirements; all other marks including size, load capacity and inflation pressure are correct. b.) The tires are marked with a maximum load capacity and load index aligned to a TRA published standard load capacity and index for single and dual applications

Identify any warning which can precede or occur:

Not applicable

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:

NR

Country:

Address 1:

NR

Address 2:

NR

City:

NR

State:

Zip/Postal Code:

NR

Company Contact Information

First Name:

NR

Last Name:

NR

Position:

NR

Email:

Phone:

Purchaser Information

Company:

NR

Country:

Address 1:

NR

Address 2:

NR

City:

NR

State:

FOREIGN STATES

Zip/Postal Code:

NR

First Name:

NR

Last Name:

NR

Position:

NR

Email:

Phone:

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:

October 21, 2019 – NHTSA Office of Vehicle Safety Compliance notified Shandong Yinbao Tyre Group of an alleged non-compliance to FMVSS for potential TIN labeling issue. On or about late October 2019 - Analysis of inventory records, sales records, production records, and tire specifications. On or about November 2019 - Confirmation of tire compliance with applicable performance requirements of FMVSS 119. On or about November 2019 - Completed assessment shows the non-compliance is limited to FMVSS 119 S6.5(b) tire markings and 49 CFR Part 574.5 (a) (1) Tire Identification Number (TIN) labeling requirement. November 21 2019 - Part 573 Noncompliance Information Report filed.

Identify the Remedy

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

SYT plans to timely file a petition for inconsequential noncompliance, pursuant to 49 USC 30118, 30120 and 49 CFR Part 556. In the event that NHTSA OVSC denies SYT's petition, SYT will, within five days of the date the denial is published in the Federal Register, provide NHTSA with the date it will begin sending notifications to owners and dealers, and will provide an appropriate remedy under the Safety Act and applicable law thereunder.

Describe what distinguishes the remedy component from the recalled component.

Not applicable at this time.

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

Among other things, the character die arrangements have been corrected in production. A verification measure has been implemented to ensure proper use of symbols per the TIN requirement.

Identify the Recall Schedule

Describe the recall schedule for notifications.:

NR. SYT plans to timely file a petition for inconsequential noncompliance, pursuant to 49 USC 30118, 30120 and 49 CFR Part 556. In the event that NHTSA OVSC denies SYT's petition, SYT will, within five days of the date the denial is published in the Federal Register, provide NHTSA with the date it will begin sending notifications to owners and dealers.

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):

1BP

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

This link expands and collapses this section. Manufacturer Comments to NHTSA Staff

SYT plans to timely file a petition for inconsequential noncompliance, pursuant to 49 USC 30118, 30120 and 49 CFR Part 556. In the event that NHTSA OVSC denies SYT's petition, SYT will, within five days of the date the denial is published in the Federal Register, provide NHTSA with the date it will begin sending notifications to owners and dealers.

Part 573 Safety Recall Report**19T-021****Manufacturer Name :** Shandong Yinbao Tyre Group**Submission Date :** NOV 21, 2019**NHTSA Recall No. :** 19T-021**Manufacturer Recall No. :** 1BP**Manufacturer Information :**

Manufacturer Name : Shandong Yinbao Tyre Group

Address : 3181 Poplar Ave.

Room # 218 Memphis TN 38111

Company phone : 7025761651

Population :

Number of potentially involved : 9,551

Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : TRANSEAGLE

Tire Line : ST

Tire Size : ST235/85,80R16; ST225/90R16

Descriptive Information : The basis for determining the recall population was identified via the tire production information including date range for which the subject tires were identified to contain an inaccurate character sequence in the TIN. It has been determined that the subject tires only differ from other tires of the same brand and model line via the TIN. All physical, quality, performance and safety aspects of the tires are the same. The number of affected products is 9551.

Production Dates : SEP 23, 2017 - AUG 10, 2019

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
1BP	TT	FEFT	4617	3219
1BP	TF	EFTL	3817	3219
1BP	TT	FEF	4818	5018

Description of Noncompliance :

Description of the Noncompliance : A limited number of tires released in the US market was inadvertently labeled with an incorrect Tire Identification Number (TIN). FMVSS No. 119 and 49 CFR Part 574 require a 13 character TIN. A portion of the subject population, subject to this recall, contains an additional character to the end of the labeled TIN sequence for the manufacturer's code, therefore inadvertently producing a 14 total character TIN. The tire information is otherwise correct, as displayed via the first 13 characters. This includes the identification of manufacturer, tire size, type or any significant characteristics of the tire. Additionally, all the other sidewall markings related to operational performance and tire service, such as size, load capacity and the corresponding inflation pressure, are correct for continued safe operation. The mislabeling will not create confusion with the company, consumers or the agency in the event of further field actions, and the noncompliance has no effect on the operational safety of vehicles/trailers upon which the tires are mounted.

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

FMVSS 2 : NR

Description of the Safety Risk : None. a.) The tires meet all applicable FMVSS 119 performance requirements; all other marks including size, load capacity and inflation pressure are correct.

b.) The tires are marked with a maximum load capacity and load index aligned to a TRA published standard load capacity and index for single and dual applications

Description of the Cause : An error in setting the die characters inadvertently occurred when during the molding of the Tire Identification Number (TIN). The inaccurate TIN for the subject tire, as shown in NHTSA's recent IR to the company, is shown as 1BP TTFEFTL. This inaccurate is shown on three sizes; (a) ST235/85R16, (b) ST235/80R16 and (c) ST225/90R16. But for an inadvertent die error, the correct TIN for tire size ST235/85R16 is 1BP TTFEFT. The correct tire size for ST235/80R16 is 1BP TFEFTL. And the correct tire for ST225/90R16 is 1BP TTFEF.

Identification of Any Warning that can Occur : Not applicable

Supplier Identification :**Component Manufacturer**

Name : NR

Address : NR

NR NR NR

Country : NR

Chronology :

October 21, 2019 – NHTSA Office of Vehicle Safety Compliance notified Shandong Yinbao Tyre Group of an alleged non-compliance to FMVSS for potential TIN labeling issue.

On or about late October 2019 - Analysis of inventory records, sales records, production records, and tire specifications.

On or about November 2019 - Confirmation of tire compliance with applicable performance requirements of FMVSS 119.

On or about November 2019 - Completed assessment shows the non-compliance is limited to FMVSS 119 S6.5 (b) tire markings and 49 CFR Part 574.5 (a) (1) Tire Identification Number (TIN) labeling requirement.

November 21 2019 - Part 573 Noncompliance Information Report filed.

Description of Remedy :

Description of Remedy Program : SYT plans to timely file a petition for inconsequential noncompliance, pursuant to 49 USC 30118, 30120 and 49 CFR Part 556. In the event that NHTSA OVSC denies SYT's petition, SYT will, within five days of the date the denial is published in the Federal Register, provide NHTSA with the date it will begin sending notifications to owners and dealers, and will provide an appropriate remedy under the Safety Act and applicable law thereunder.

How Remedy Component Differs from Recalled Component : Not applicable at this time.

Identify How/When Recall Condition was Corrected in Production : Among other things, the character die arrangements have been corrected in production. A verification measure has been implemented to ensure proper use of symbols per the TIN requirement.

Recall Schedule :

Description of Recall Schedule : NR. SYT plans to timely file a petition for inconsequential noncompliance, pursuant to 49 USC 30118, 30120 and 49 CFR Part 556. In the event that NHTSA OVSC denies SYT's petition, SYT will, within five days of the date the denial is published in the Federal Register, provide NHTSA with the date it will begin sending notifications to owners and dealers.

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 NR 00 NR

Country : NR

Company Phone : NR

* NR - Not Reported