

June 25, 2020

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

Re: Petition for Exemption for Inconsequential Noncompliance with FMVSS 574 –
Tire Identification and Recordkeeping

Ref: 49 CFR Part 573 Report: Achilles, Corsa, Radar & Milestar brand tires

NHTSA ID: 20T010

Dear Sir or Madam:

Pursuant to 49 U.S.C. § 30118(d) and 49 U.S.C. § 30120(h) and in accordance with the requirements of 49 CFR 556, PT. Multistrada Arah Sarana, Tbk (MASA), hereby requests exemption from the notification and remedy requirements of the Motor Vehicle Safety Act, 49 U.S.C., Chapter 301, with respect to a noncompliance with Federal Motor Vehicle Safety Standard (FMVSS) 574 – Tire Identification and Recordkeeping.

This petition concerns a noncompliance of 1,673,307 Achilles, Corsa, Radar and Milestar brand tires in various sizes produced by PT. Multistrada Arah Sarana, Tbk (MASA) in Cikarang, Indonesia between January 3, 2016 and March 14, 2020. The subject tires do not fully comply with 49 CFR 574.5 Tire Identification Requirements as required by 49 CFR 571.139 S5.5.1 Tire Identification Number.

Pursuant to 49 CFR 573, PT. Multistrada Arah Sarana, Tbk submitted a Noncompliance Report, NHTSA ID 20T010, on June 2, 2020. As indicated in the June 2, 2020 filing, this petition is being submitted for exemption from the notification and remedy requirements on the basis that the noncompliance is inconsequential with respect to motor vehicle safety.

Background

In an effort to improve tire identification and traceability, MASA introduced a modified optional code sequence which utilized up to 6 characters in the tire identification number third grouping. The tire codification sequence did not take into consideration the constraint in 49 CFR 574.5 which limits the optional code to no more than 4 characters. The expanded optional code marking was used on multiple skus produced by MASA until March 2020.

Factory and Export Sales:

Jl. Raya Lemahabang km 58,3 Desa Karang Sari, Cikarang Timur, Bekasi Jawa Barat 17550, Indonesia.
Phone: (+62)21 89140333 | Fax: (+62)21 89143838

Indonesia Sales:

PT Michelin Indonesia,
Pondok Indah Office Tower 2 Lt. 12, Jl. Sultan Iskandar Muda Kav. V-TA, Jakarta Selatan 12310, Indonesia.
Phone: (+62)21 29353600



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RADIAL

www.multistrada.co.id

In 2019 MASA was acquired by Compagnie Générale des Etablissements Michelin. The first tire bearing a noncompliant marking was identified during routine quality inspection of field returns by Michelin North America, Inc. in Greenville, South Carolina. A subsequent investigation was launched by MASA in conjunction with Michelin North America, Inc., resulting in the 573 filing on June 2, 2020. The details of the tire brands and sizes impacted as well as the chronology of events are contained in the 573 filing.

Tire Identification Number Markings:

In April 2015 NHTSA introduced a revision to 49 CFR 574.5 which introduced the new three-symbol plant code and standardized 13-character TIN with phase-in until April 13, 2025. Per CFR 574.5(b) a tire manufacturer using the two-symbol plant code must comply with the old TIN content requirement as specified in CFR 574.5(g):

The following requirements are applicable to tire manufacturers who were previously assigned two-symbol plant codes by NHTSA and to retreaders. A new tire manufacturer who continues to use a previously assigned two-symbol plant code in place of a new three-symbol plant code and a retreader may optionally comply with this paragraph instead of paragraph (b) of this section until April 13, 2025.

- (1) First grouping. The plant code, consisting of two symbols, must be the first group of the TIN.
- (2) Second grouping. For new tires, the second group, consisting of no more than two symbols, must be used to identify the tire size.
- (3) *Third grouping.* The third group, consisting of no more than four symbols, may be used at the option of the manufacturer or retreader as a descriptive code for the purpose of identifying significant characteristics of the tire.

An example of the non-compliant TIN marking which applied more than four symbols in the third group:



Analysis

1. Operational Safety

- a. The Tire Identification Number (TIN) marking noncompliance does not create any operational safety risk for the vehicle. The tires comply with applicable Federal Motor Vehicle Safety Standards performance requirements and all other applicable regulations. A summary of production tire compliance audit testing will be provided to NHTSA separately from this filing.

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- b. The incorrect TIN marking with additional characters in the optional code has no bearing on tire performance.
- c. The subject tires are properly marked with all other markings required under FVMSS 139 such as S5.5(c) maximum permissible inflation pressure and S5.5(d) maximum load rating. The necessary information is available on the sidewall of the tire to ensure proper application and usage.
- d. The subject tires contain the DOT symbol on both sidewalls thus indicating conformance to applicable Federal Motor Vehicle Safety Standards.

2. Identification & Traceability

- a. All information required by 49 CFR 574.5 for the Tire Identification Number (plant code + size code + option code + date code) is present on the sidewall of the tire.
- b. For identification and traceability purposes the key information of plant code and manufacturing date is present on the tire.
- c. The existence of extra characters in the optional code does not inhibit the ability of a tire distributor, the tire dealer or the consumer to register the tires.
- d. In the event that dealer / owner notifications are required the TIN, as molded on the subject tires, is sufficient to insure proper communication and identification of the tires.
- e. To date there is no record of a distributor, dealer, consumer or other concerned party raising a question about tires with the extraneous characters in the TIN optional code.

3. Proactive Measures

- a. Internal communications to sales and customer service functions who may have contact with consumers, dealers and distributors associated with the concerned products
- b. External communications with specific distributors and dealers associated with the concerned products
- c. Confirmation that tires with extraneous TIN optional code characters can be properly registered on the Achilles Tire USA website

Summary

Based on the information presented, the tires molded with extraneous TIN optional code characters do not present a risk for motor vehicle safety. Additionally, identification and traceability of the subject tires could be accomplished in the event of a need to conduct a dealer / owner notification. Production records link plant code, size code and optional code with the manufacturing dates for all concerned brands and tire sizes. Considering these points, MASA believes the subject noncompliance is inconsequential as it relates to motor vehicle safety. Additionally, considering the proactive response taken jointly by MASA and MNA following the acquisition of MASA and NHTSA's prior decisions regarding moot or inconsequential findings related to TIN content marking noncompliances, MASA respectfully requests that NHTSA grant

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the petition for exemption from notification requirements of 40 U.S.C. § 30118 and the remedy provisions of 49 U.S.C. § 30120.

If you or your staff has any questions regarding this petition, please contact June Satterfield, Director, Industry Standards and Government Regulations, Michelin North America, Inc., at 864-458-4612

Sincerely,

A handwritten signature in blue ink, appearing to read "S. VETTE", is written over a large, faint, circular watermark in the background of the page.

Steven VETTE
President Director
PT. Multistrada Arah Sarana Tbk.

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Part 573 Safety Recall Report

20T-010

Manufacturer Name : PT. Multistrada Arah Sarana, Tbk**Submission Date :** JUN 01, 2020**NHTSA Recall No. :** 20T-010**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : PT. Multistrada Arah Sarana, Tbk

Address : Jl. Raya Lemahabang Km. 58,3
Desa Karangsari Cikarang Timur 00
17550

Company phone : 4451370

Population :

Number of potentially involved : 1,673,307

Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : Achilles + others

Tire Line : various

Tire Size : various

Descriptive Information : Replacement market tires primarily intended for application on passenger cars, sport utility vehicles and light trucks. Subject tires have marking error in the Tire Identification Number (TIN) third grouping optional code. In total 73 skus accounting for 1,673,307 tires produced. A complete file of skus involved including tire brand, tire line, tire size and production dates will be uploaded to the safecar.gov portal.

Production Dates : JAN 03, 2016 - MAR 14, 2020

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
5K	various	various	0116	1020

Description of Noncompliance :

Description of the Noncompliance : The regulation 49 CFR 574.5 requires tires to be labelled with a tire identification number (TIN). For tires produced in a factory which had been assigned a 2-character plant code the first grouping is the 2-character plant, the second grouping is the tire size code containing no more than 2 characters, the third grouping is the optional code consisting of no more than 4 characters and the fourth grouping is the 4-character manufacturing date code. The subject tires have been produced with optional codes containing 5 or 6 characters. As such the tires do not comply with 49 CFR 574.5(g) which defines the TIN marking for tires produced and labelled with a 2-character plant code.

FMVSS 1 : 574 - Tire Identification & Recordkeeping

FMVSS 2 : 139 - New pneumatic radial tires for light vehicles

Description of the Safety Risk : No safety risk has been identified is association with additional characters being present in the Tire Identification Number optional marking. The extraneous one or two characters in the optional code do not inhibit the consumers' or dealers' ability to register or identify the tires or MASA's ability to notify consumers and dealers in the event of a product recall.

Description of the Cause : 151 molds were manufactured using an incorrect interpretation of the regulation by PT Multistrada Arah Sarana Tbk (MASA), as it pertains to the use of the optional third grouping in the tire identification number.

Identification of Any Warning that can Occur : Not applicable

Involved Components :

Component Name : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

2019 - MASA was acquired by Compagnie Générale des Etablissements Michelin. MASA is an affiliate of Michelin North America, Inc. (MNA).

February 21, 2020 - One tire was observed with 5-character optional code during routine internal inspection of field returns. Investigation launched by MASA on the tire marking history.

March 11, 2020 - MASA completed review of tire marking history, molds and production. Investigation concluded that multiple skus had been produced with 4 or 5-character optional codes. All impacted skus were blocked in MASA warehouse. Corrective actions initiated.

March 12, 2020 - Michelin North America, Inc. received results of MASA tire marking investigation. At that time, the distribution and sales network of Multistrada and Achilles Tire USA was in transition, and business agreements, legal and reporting responsibilities required review.

May 5, 2020 – MNA confirmed that there are no subject tires within the control of Achilles Tire, USA.
May 21, 2020 – Following a review of US sales data, MNA initiated the preparation of a 573 filing
May 28, 2020 – MNA informed MASA representatives to submit the 573 with intent to file a petition for a finding of inconsequential noncompliance

Description of Remedy :

Description of Remedy Program : Not applicable pending inconsequential filing

How Remedy Component Differs from Recalled Component : Not applicable pending inconsequential filing

Identify How/When Recall Condition was Corrected in Production : Affected tires still under the control of MASA were blocked and marking error corrected. A process was launched to correct the mis-marking of the molds immediately upon detection of the error.

Recall Schedule :

Description of Recall Schedule : Not applicable pending inconsequential filing

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