



COOPER TIRE & RUBBER COMPANY
701 Lima Avenue, Findlay, Ohio 45840

Kathleen M. Cindric
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July 31, 2020

**SENT VIA CERTIFIED MAIL –
RETURN RECEIPT REQUESTED**

James C. Owens, Deputy Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
West Building Ground Floor
Washington, DC 20590

Re: Petition for Determination of Inconsequential Noncompliance
NHTSA Transaction ID No. **20T-013**
Cooper Tire Recall No. **176**

Dear Administrator King:

Pursuant to the requirements of 49 U.S.C. § 30118(d) and 49 C.F.R. Part 556, Cooper Tire & Rubber Company (“Cooper Tire”), 701 Lima Avenue, Findlay, Ohio 45840, a Delaware corporation, with its principal place of business in Findlay, Ohio, submits this petition for determination of inconsequential noncompliance. Cooper Tire requests that the agency make a determination that the noncompliance described below is inconsequential to motor vehicle safety and that the company be exempted from the notification and remedy requirements under the National Traffic and Motor Vehicle Safety Act.

Background

On July 6, 2020, Cooper Tire submitted a Noncompliance Information Report to NHTSA pursuant to 49 U.S.C. § 30118(c) and 49 C.F.R. § 573.6 (the “Part 573 Report”). NHTSA assigned the matter Transaction ID No. **20T-013**. As described in the Part 573 Report, the affected population of tires consists of the following:

<u>Description (including size)</u>	<u>Tire Identification No./ Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
Cooper Discoverer AT3 Tubeless Radial tires LT 245/75R16	UT 11 1M1 1820 - 2220 May 3, 2020 – May 31, 2020	271	100%

Paragraph S5.5.1 of Federal Motor Vehicle Safety Standard No. 139 requires these tires to be labeled with the tire identification number (“TIN”) required by 49 C.F.R. Part 574. The TIN requirements in turn are provided by 49 C.F.R. § 574.5. As is relevant here, NHTSA’s regulation at 49 C.F.R. § 574.5(g) states in part,

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.

Cooper Tire continues to use a two-symbol plant code at its Texarkana, AR facility, and thus this provision is applicable. *See* 49 C.F.R § 574.5(a)(5).

49 C.F.R. § 574.5(g)(1) - (4) specifies what each grouping of numbers after the “DOT” represents. The first grouping is the plant code (UT); the second grouping is the tire size (11); the third grouping is an optional brand name owner code used for purposes of identifying significant characteristics of the tire (1M1). The first three groupings of numbers on the affected tires are correctly stamped.

The fourth grouping of numbers in the TIN, according to 49 C.F.R. § 574.5(g)(4) should be the “[d]ate code, consisting of four numerical numbers”. “The date code must identify the week and year of manufacture. The first and second symbols of the date code must identify the week of the year...The third and fourth symbols of the date code must identify the last two digits of the year of manufacture.”

For the limited population of 271 tires subject to this petition, there is an additional grouping of letters/numbers (V02R) representing the press location, that comes before the date code. The date code immediately follows. The TIN therefore reads: DOT UT 11 1M1 V02R 1820 (underline added for emphasis). It should read: DOT UT 11 1M1 1820. All other stamping on the tires is correct.

Request for Determination that the Noncompliance is Inconsequential to Motor Vehicle Safety

While the 271 tires in the subject population contain an additional grouping of letters/numbers before the required date code, these tires are in all other respects properly labeled and meet all performance requirements under the Federal Motor Vehicle Safety Standards. The additional press location grouping has no bearing on the performance or operation of the tires and does not create a safety concern to either the operator of the vehicle on which the tires are mounted, or the safety of personnel in the tire repair, retread, and recycle industry.

Tires produced by manufacturers that continue to use two-digit plant codes (available through 2025) can have TINs that vary in length depending on the use of the optional brand name owner code. The addition of the press location (V02R), while incorrectly placed on the tire, will not cause confusion for the consumer or dealer that is selecting and mounting the tire. Consumers/dealers will continue to see the date code appear at the end of the series of letters and numbers that begin with "DOT". NHTSA's guidance states that "the last four digits of the TIN show the week and year of manufacturer." See NHSTA's "Safety in Numbers", June 2013, Volume 1, Issue 3 available at https://www.nhtsa.gov/nhtsa/SafetyInNumbers/june2013/9719_images/9719_S1N_Tires_Nwsltr_June13_062713_v4_tag.pdf. That guidance is still accurate here. Consumers and dealers will be able to easily identify the date of manufacture (week/year).

Tire registration and traceability will not be interrupted. Cooper Tire's internally controlled online registration system has been modified to be able to accept the TINs with the additional press location grouping. Any tires registered with that TIN will be identified and recorded properly. This will ensure that Cooper is able to identify these tires in the event they must be recalled.

NHTSA has granted a number of previous inconsequentiality petitions relating to out-of-order or mislabeled TINs, provided that the mislabeling does not affect the manufacturer's ability to identify the tires. "The purpose of the date code is to identify a tire so that, if necessary, the appropriate action can be taken in the interest of public safety—such as, a safety recall notice." *Bridgestone/Firestone, Inc.; Grant of Application*, 64 Fed. Reg. 29,080 (May 28, 1999); see also *Cooper Tire & Rubber Company, Grant of Application*, 68 Fed. Reg. 16,115 (April 2, 2003) (same). Accordingly, NHTSA has explained in multiple instances that "[t]he agency believes that the true measure of inconsequentiality to motor vehicle safety in this case is the effect of the noncompliance on the ability of the tire manufacturer to identify the tires in the event of recall." *Bridgestone/Firestone, Inc., Grant of Application*, 66 Fed. Reg. 45,076 (Aug. 27, 2001).

As a result, NHTSA has granted petitions and found that TIN noncompliance is inconsequential to safety in cases where the TIN is out of sequence or mislabeled. See, e.g., *Bridgestone Firestone North America Tire, LLC, Grant of Petition*, 71 Fed. Reg. 4396 (Jan. 26, 2006) (granting petition where date code was missing because manufacturer could still identify and recall the tires); *Cooper Tire & Rubber Company, Grant of Application*, 68 Fed. Reg. 16,115 (April 2, 2003) (granting petition where tires were labeled with wrong plant code, because "the tires have a unique DOT identification"); *Bridgestone/Firestone, Inc., Grant of Application*, 66 Fed. Reg. 45,076 (Aug. 27, 2001) (granting petition where the date code was labeled incorrectly, because "the information included on the tire identification label and the manufacturer's tire production records is sufficient to insure that these tires can be identified in the event of a recall"); *Bridgestone/Firestone, Inc.; Grant of Application*, 64 Fed. Reg. 29,080 (May 28, 1999) (granting petition where the wrong year was marked in date code on the tires); *Cooper Tire & Rubber Company; Grant of Application*, 63 Fed. Reg. 29,059 (May 27, 1998) (granting petition where date code was missing where tires had a unique TIN for recall purposes); *Bridgestone/Firestone, Inc.; Grant of Application*, 60 Fed. Reg. 57,617 (Nov. 16, 1995) (granting petition where date code was out of sequence); *Uniroyal Goodrich Tire Company; Grant of Petition*, 59 Fed. Reg. 64,232 (Dec. 13, 1994) (granting petition where week and year were mislabeled on tires).

As with other cases in which NHTSA has granted petitions for a determination of inconsequential noncompliance, Cooper will be able identify the tires that are the subject of this petition in the event of recall. As described above, these tires will have a unique DOT identifier that will allow for Cooper to identify and recall them in the event that any issues arise in the future. Accordingly,

Cooper respectfully requests that NHTSA find that the noncompliance is inconsequential to motor vehicle safety.


Cooper Tire has taken steps over the last few years to add additional checks in its processes to prevent TIN errors. We are undertaking additional process reviews at this time. Cooper Tire is also reviewing its inspection processes to ensure that any errors are identified earlier and/or prevented before they occur.

Based on the foregoing, Cooper Tire respectfully requests that the Administrator exempt it from the requirements of giving notice and remedy.

As required by 49 C.F.R. § 556.4(b)(6), three copies of the information required, in accordance with 49 C.F.R. Part 573, are attached as Attachment A.

Respectfully submitted,

COOPER TIRE & RUBBER COMPANY



Kathleen M. Cindric
Senior Counsel

Enclosures: 573 Defect and Noncompliance Information Report (3 copies)

Attachment A
[three (3) copies]

Part 573 Safety Recall Report

20T-

Manufacturer Name : Cooper Tire & Rubber Co.

Submission Date : JUL 02, 2020

NHTSA Recall No. : 20T-

Manufacturer Recall No. : 176



Manufacturer Information :

Manufacturer Name : Cooper Tire & Rubber Co.

Address : 701 Lima Avenue

Findlay OH 45840

Company phone : 4194206040

Population :

Number of potentially involved : 271

Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : Cooper

Tire Line : DISCOVERER AT3 LT

Tire Size : LT 245/75R16

Descriptive Information : The affected population is certain standard load radial tubeless light truck tires produced by the manufacturer from May 3, 2020 through May 31, 2020 in cure press V02R. These products differ from other products in that they have a unique brand, size, or DOT code and were cured in one cure press, V02R, where the mold had the press location plug and the week/year plug reversed.

Production Dates : MAY 03, 2020 - MAY 31, 2020

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
UT	11	1M1	1820	2220

Description of Noncompliance :

Description of the Noncompliance : The subject tires as manufactured were found to have the press location plug and the week/year plug reversed in the mold. Therefore, the DOT code reads UT 11 1M1 V02R 1820, when it should read UT 11 1M1 1820, followed by V02R. The sidewall of the affected units accurately reflect the production week; however, it follows the press location plug.

FMVSS 1 : 574 - Tire Identification & Recordkeeping

FMVSS 2 : NR

Description of the Safety Risk : There is no safety risk associated with this non-compliance.

Description of the Cause : The press location plug and week/year plug were reversed in the mold.

Identification of Any Warning Not applicable.
that can Occur :

Involved Components :

Component Name : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : Cooper Tire & Rubber Company

Address : 3500 Washington Road

Texarkana ARKANSAS 71854-5894

Country : United States

Chronology :

On or about May 31, 2020 it was discovered the mold located in the V02R position had the press location plug and the week/year plug reversed in the mold. The mold was removed from service and the issue was corrected. It was determined that the reversed plugs were installed when the mold was put into curing press V02R on May 4, 2020. A restriction was issued by the company on May 31, 2020. A search and sort of internal inventories, including distribution centers was then completed. It was determined that 271 affected tires produced from the V02R mold were not within the Company's control. On June 26, 2020, Cooper Tire's Compliance Committee determined that a non-compliance with an applicable Federal motor vehicle safety standard exists in the 271 units. The Committee further determined the identified noncompliance is inconsequential as it relates to motor vehicle safety.

Description of Remedy :

Description of Remedy Program : NR

How Remedy Component Differs NR
from Recalled Component :

Part 573 Safety Recall Report**20T-****Manufacturer Name :** Cooper Tire & Rubber Co.**Submission Date :** JUL 02, 2020**NHTSA Recall No. :** 20T-**Manufacturer Recall No. :** 176**Manufacturer Information :****Manufacturer Name :** Cooper Tire & Rubber Co.**Address :** 701 Lima Avenue

Findlay OH 45840

Company phone : 4194206040**Population :****Number of potentially involved :** 271**Estimated percentage with defect :** 100 %**Tire Information :****Tire Brand 1 :** Cooper**Tire Line :** DISCOVERER AT3 LT**Tire Size :** LT 245/75R16

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Component Description : NR

Component Part Number : NR

Supplier Identification :**Component Manufacturer**

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Texarkana ARKANSAS 71854-5894

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Description of Remedy :

Description of Remedy Program : NR

How Remedy Component Differs NR
from Recalled Component :

SAFETY

IN NUMBERS

Tires: Your safety and your life are riding on them.

Life-Saving Numbers

1

The number of times you should check your vehicle's tires monthly.

2
32"

Point at which tread becomes even with treadwear indicators, telling you it is time to replace your tires.

25%

TPMS-equipped vehicles will warn at this level of severe underinflation.

6 to 10

Number of years after which some tire manufacturers recommend you replace your vehicle's tires - even your spare!

Many drivers are aware of the importance of their vehicle's strength *during* a crash. But are we as familiar with one of the most important features of our vehicle in *avoiding* a crash - tires? As summer arrives and we venture out on road trips, it is the perfect time to learn more about tire safety.

Your vehicle's tires are the only thing between you and the road. To help ensure they can perform their best in a critical driving situation, invest a little time to incorporate tire safety into your regular vehicle maintenance. The time you spend checking your tires is minimal compared to the safety consequences of tire failure.

NHTSA's Crash Causation Survey found that there was an issue with a tire before the crash occurred in 1 of 11 crashes (9%). Issues included tread separations, blowouts, bald tires, and underinflation (www-nrd.nhtsa.dot.gov/Pubs/811617.pdf).

Underinflation leads to poor fuel economy, sluggish handling, longer stopping distances, and increased stress to tire components. Another concern is how heat affects tires. In the hot summer months, the high heat and hot roadways contribute to the breakdown of tires and a greater opportunity for tire failure.

For further information about tire safety, visit:

www.SaferCar.gov/Tire



U.S. Department of Transportation
National Highway Traffic Safety
Administration



THE PROBLEM

Tire Inflation and TPMS

- Underinflated tires lead to sluggish handling, longer stopping distances, increased stress to tire components, and heat buildup. These in turn can lead to catastrophic failure of the tire, such as separation or blowout.
- Underinflation also decreases fuel economy. Proper inflation strikes the perfect balance of maximized safety and fuel economy – both related to the amount of surface contact between the tire and the road.
- A NHTSA study of tire inflation pressure and tire pressure monitoring systems (TPMS) showed that 12 percent of all passenger vehicles in the United States of model years 2004-2011 (with and without TPMS) have at least one tire underinflated by at least 25 percent (www-nrd.nhtsa.dot.gov/Pubs/811681.pdf).
- NHTSA estimates that TPMS reduces by half (56%) the likelihood that a vehicle will have one or more severely underinflated tires.
- TPMS is estimated to have saved more than \$510 million in fuel across the vehicle fleet during 2011.
- You can improve your gas mileage by up to 3.3 percent by keeping your tires inflated to the proper pressure (www.fueleconomy.gov/feg/drive.shtml).



Tire Pressure Monitoring System (TPMS) Indicator

All passenger cars, light trucks, and vans that are Model Year 2008 or newer are equipped with TPMS.

When the indicator illuminates, at least one of your tires is more than 25% underinflated. Inspect the tires and check the tire pressure as soon as possible.

Tire Aging

- Any rubber begins to break down over time. Heat accelerates this process. The rubber in your tires also breaks down over time, a process referred to as tire aging.
- Even though a tire may have a lot of remaining tread, its integrity may be compromised. The effect of aging may not be visibly detectable.
- Tires age whether they are driven on or not and are a concern for infrequently used vehicles and spare tires.
- An analysis of crashes in the National Automotive Sampling System from 2005-2007 estimates that 90 people die and an additional 3,200 are injured each year in crashes in which tire aging was a factor (www.scribd.com/doc/137377038/NHTSA-Report-on-tire-aging).
- As tires age, they are more prone to failure.
- Some tire manufacturers recommend replacing tires that are 6 to 10 years old, regardless of tread wear.

Relation to Crashes

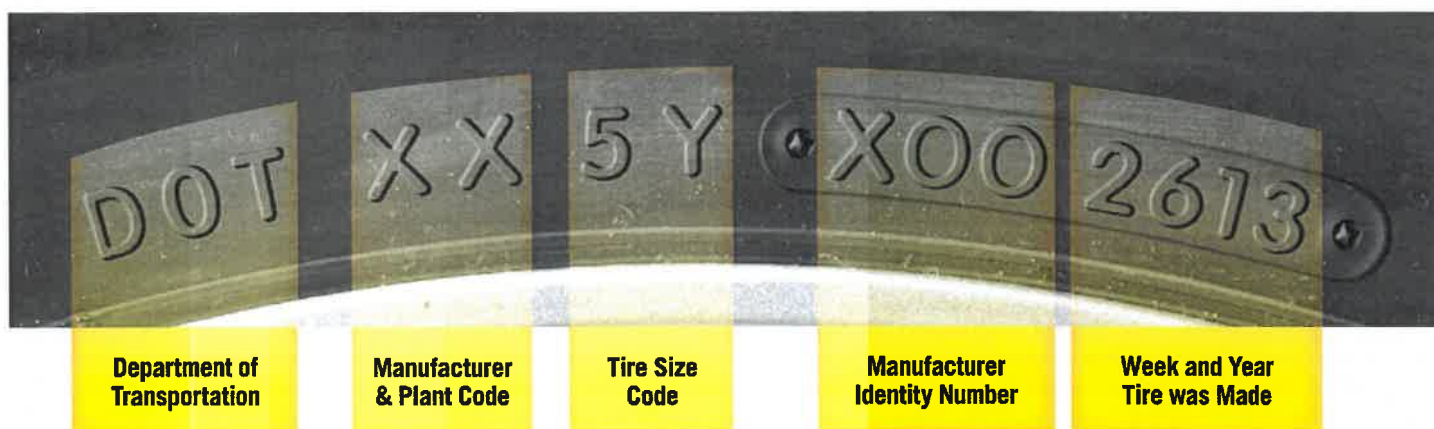
- NHTSA reviewed data from the National Motor Vehicle Crash Causation Survey for tire-involvement before the crash occurred (www-nrd.nhtsa.dot.gov/Pubs/811617.pdf).
- About 9 percent of the estimated total crashes were “tire-related crashes.” Some of the issues included tread separations, blowouts, bald tires, and underinflation.
- With tread depth at 2/32” or less, vehicles experienced tire problems before the crash three times more than vehicles with tread depth between 3 to 4/32”. According to the tire industry, the average new tire for a car starts with a tread depth of 10/32” to 11/32”.
- Data shows that many more vehicles than expected experienced tire problems when driven under adverse roadway conditions (wet roads, roads underwater, slick roads).



THE FACTS

Tire Identification Number (TIN)

The last four digits of the TIN show the week and year of manufacture. Use this date code to determine the age of your tires. For this particular tire, the "2613" indicates the tire was manufactured in the 26th week of 2013.




Tire and Loading Information Label

All passenger cars, light trucks, and vans that are Model Year 2006 or newer have this label.

Located on the driver's side door edge or door post, the placard provides information about proper tire inflation pressure and maximum load for the specific vehicle.

For older vehicles, a black-and-white label may be located in the glove box.

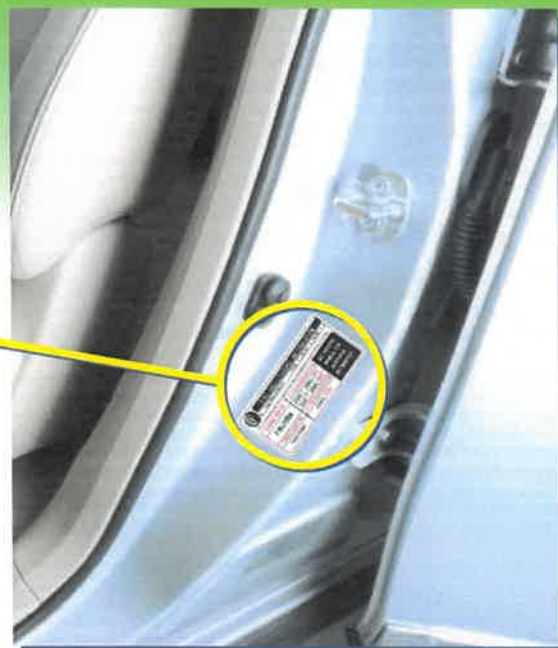


TIRE AND LOADING INFORMATION

SEATING CAPACITY	TOTAL 5	FRONT 2	REAR 3
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The combined weight of occupants and cargo should never exceed **XXX** kg or **XXX** lbs.

ORIGINAL TIRE SIZE	COLD TIRE INFLATION PRESSURE		SEE OWNER'S MANUAL FOR ADDITIONAL INFORMATION
P195/70R14	FRONT	200kPa, 29PSI	
	REAR	200kPa, 29PSI	
COMPACT SPARE TIRE	COLD TIRE INFLATION PRESSURE		
T125/70D15	420kPa, 60PSI		



WHAT YOU CAN DO



Proper Tire Inflation

- Follow the recommended tire pressure in pounds per square inch (psi) for your vehicle. This information is found on the vehicle placard and in your vehicle owner's manual.
- Remember that the correct inflation pressure for your vehicle is found on the vehicle placard, **not** on the tire sidewall.
- Understand that tires may lose 1 psi every month.
- Know where the TPMS warning is on your vehicle dashboard, if equipped with TPMS, and take action if you receive this warning.
- Don't forget to check the inflation pressure in your spare tire as well as all tires on infrequently used vehicles.
- Carry a tire pressure gauge in your vehicle to ensure an accurate reading of tire inflation pressure. Don't rely simply on visual inspection of your tires to determine whether they are underinflated (www.safercar.gov/Vehicle+Shoppers/Tires/Tires+Rating/General+Information).
- Check out NHTSA's tire safety brochure: *Tire Safety – Everything Rides On It* (www.nhtsa.gov/DOT/NHTSA/Vehicle%20Safety/Articles/Associated%20Files/brochure.pdf).

Tire Aging

- Check your vehicle owner's manual for specific recommendations for tire replacement for your vehicle. Some tire manufacturers cite 6 years, others recommend 10 years as the maximum service life for tires.
- Look at the sidewall of your tire for the tire identification number (TIN). The last four digits are the week and year of manufacture. Some older tires may have the TIN on the inside sidewall.



- Don't forget about your spare tire. Just because the tire hasn't been used and the tread is not worn, the tire may be too old to operate safely.
- Be aware of tires on vehicles with occasional use – like recreation vehicles, collector cars, community vehicles, and 15-passenger vans – as they are also susceptible to tire aging.
- Remember that the effects of tire aging may not be visible, so do not rely on visual inspection for damage to know whether the tire may have degraded over time (www.safercar.gov/Vehicle+Shoppers/Tires/Tires+Rating/Tire+Aging).

Tire Tread

- Monitor the tread on **all** tires on your vehicle. Tires are not safe and should be replaced when the tread is worn down to 2/32".
- Look for the treadwear indicators – raised sections spaced throughout the bottom of the tread grooves. When they appear even with the outside of the tread, it is time to replace your tires.
- Try the penny test. Place a penny in the tread of your tires with Lincoln's head upside down and facing you. If you can see the top of Lincoln's head, your tire has less than 2/32" of tread and you are ready for new tires.



If your tire has less than 2/32" of tread, you are ready for new tires.

For further information about tire safety, visit:

www.SaferCar.gov/Tire

NHTSA-200806-002

DOT HS 811 800

9719-062713-v4

★★★★★
NHTSA
www.nhtsa.gov

www.nhtsa.gov
1200 New Jersey Avenue SE.
Washington, DC 20590
1-888-327-4236



Part 573 Safety Recall Report

20T-013

Manufacturer Name : Cooper Tire & Rubber Co.

Submission Date : JUL 06, 2020

NHTSA Recall No. : 20T-013

Manufacturer Recall No. : 176



Manufacturer Information :

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Address : 701 Lima Avenue

Findlay OH 45840

Company phone : 4194206040

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Tire Brand 1 : Cooper

Tire Line : DISCOVERER AT3 LT

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TIN (Tire Identification Number)

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

FMVSS 2 : NR

Description of the Safety Risk : There is no safety risk associated with this non-compliance.

Description of the Cause : The press location plug and week/year plug were reversed in the mold.

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 : Cooper Tire & Rubber Company

Address : 3500 Washington Road
Texarkana ARKANSAS 71854-5894

Country : United States

Chronology :

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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 : The issue was resolved when the press location plug and the week/year plug on the V02R mold were switched into the proper position on May 31, 2020.

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