

**Transamerica Tire Co. Ltd.**

**Derek Zhang**

3181 Poplar Ave.

Memphis, TN 38111

P: 702-576-1651

E: derek@transamericatire.com

April 22, 2021

**VIA E-MAIL ONLY**

Dr. Steve Cliff  
Acting Administrator  
National Highway Traffic Safety Administration (NHTSA)  
1200 New Jersey Avenue, SE  
Washington, DC 20590

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

Dear Acting Administrator Cliff,

As requested by Abe Diaz, Transamerica Tire Co. Ltd. (“Transamerica”) is submitting this brief supplement to its Petition for Inconsequential Noncompliance (“Petition”) in accordance with 49 U.S.C. §§ 30118, 30120 and 49 C.F.R. Part 556, which was timely filed with agency on November 25, 2019 and remains pending. 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.

In its principal November 25, 2019 filing, Transamerica stated, among other things, that 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 acknowledges that the TIN 1BP TTFEF is also noncompliant because it does not contain six symbols. See 49 C.F.R. 574.5(b). Nonetheless, Transamerica previously confirmed that, except for the incorrect manufacturer’s code, all other information labeled on the tires was correct – including the tire with the five symbol manufacturer code - and that Transeagle ST Tires otherwise comply with all applicable standards. Accordingly, this 5 symbol noncompliance is inconsequential for all the same reasons set forth in Transamerica’s principal November 25, 2019 filing.

For the reasons set forth above, as well as all those set forth in its November 25, 2019 principal filing, 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 or additional information today, please do not hesitate to contact me at any time, either by e-mail at [derek@transamericatire.com](mailto:derek@transamericatire.com), or by phone at 702-576-1651.

Sincerely,

A handwritten signature in black ink that reads "Derek Zhang". The signature is written in a cursive style with a large, stylized "D" and "Z".

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Derek Zhang  
President  
Transamerica Tire Co. Ltd.