



Harald Morgenstern

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Dec.22, 2021

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

Re: Continental Tire the Americas, LLC - Petition for Exemption based on an Inconsequential Noncompliance with FMVSS No.119, related to NHTSA ID: 21T019

Dear Mr. Cliff,

On December 2, 2021, Continental Tire the Americas, LLC ("CTA"), submitted a Noncompliance Information Report pursuant to 49 CFR Part 573 with respect to a noncompliance of certain tires related to testing requirements of Federal Motor Vehicle Safety Standard ("FMVSS") No. 119, "New Pneumatic Radial Tires for motor vehicles with a GVWR of more than 4,536 Kilograms (10,000 pounds) and motorcycles."

CTA seeks exemption from the notice and remedy requirements of the Motor Vehicle Safety Act, pursuant to 49 U.S.C. § 30118(d) and § 30120(h) and 49 CFR Part 556, on the basis that the noncompliance is inconsequential to motor vehicle safety.

1. Background

Authorized symbols for use in the DOT TIN are defined in 49 CFR 574.5(f): *Authorized symbols. The only symbols that manufacturers and retreaders are allowed to use in the tire identification number are: A, B, C, D, E, F, H, J, K, L, M, N, P, R, T, U, V, W, X, Y, 1, 2, 3, 4, 5, 6, 7, 8, 9, and 0.*

CTA discovered one motorcycle tire with a noncompliant symbol in the DOT TIN. This triggered CTA to perform a thorough search of all its tire sidewall specifications for the unauthorized symbols "G, I, O, Q, S, Z." This search uncovered 43 motorcycle tire

products, all produced in one manufacturing plant. Please see Attachment 1: List of Affected Products.

2. Reasons Why the Noncompliance Is Inconsequential to Motor Vehicle Safety

- a. Tire Registration: Continental branded tires can be registered as required by 49 CFR 574.7 and searched for in case of any future recalls. CTA contracts with a third-party Computerized Information and Management Services, Inc. ("CIMS") for collecting tire registrations that are submitted electronically or by paper form. CIMS maintains a database of all CTA's tire registrations for the purpose of identifying purchasers of tires in the event of a future recall. CIMS performs a smart search, which captures not only the exact matching DOT TIN's, but also close matching database entries. For example, if an "l" was misrepresented as a "1" or vice versa.
- b. Recall Lookup Tool: The U.S. Tire Manufacturers Association ("USTMA") online recall lookup tool has a built-in algorithm that allows unauthorized letters to be used interchangeable with the corresponding numbers (G or 6, l or 1, 0 or O, etc.), which allows the appropriate recall to be located. This also is helpful in case a tire owner mistakenly indicates an unauthorized letter instead of its corresponding number.
- c. NHTSA DOT Plant Codes: NHTSA has officially issued DOT Plant Codes in the past using unauthorized letters, as for example plant code "6G" which was issued for the Continental Tire's manufacturing location in Timisoara, Romania. The use of the letter "G" in this case does not cause any issues with tire registration and would not affect the registration search in the case of a recall. Similarly, the unauthorized letters used in the affected tires will not affect tire registration or searching for the related DOT TIN's in case of a future recall.
- d. Sales Stop of Identified Noncompliant Products: CTA has stopped sales of all affected noncompliant products in the USA and Canada and has initiated the process of changing tire curing molds to compliant DOT TIN's. Furthermore, the mold change dates will be documented in the CTA specification system for future traceability.
- e. Prevention of Reoccurrence: CTA's tire sidewall specification system is being modified to include a control point before a DOT TIN can be released for production. Future DOT TIN's will follow the new regulation for 13-digit codes, including a 3-digit plant code and 6-digit manufacturers code. The 6-digit code is automatically generated by the specification system, which assures that only authorized symbols are used.

3. Conclusion

For all the foregoing reasons, CTA respectfully requests NHTSA to decide that the noncompliance identified in this petition is inconsequential as it relates to motor vehicle safety, and to grant an exemption from the notification and remedy provisions of the National Traffic and Motor Vehicle Safety Act and NHTSA's implementing regulations.

If you have any questions about this report, please contact the undersigned at (704) 965-7469 or at harald.morgenstern@conti-na.com.

Sincerely,



Harald Morgenstern
Manager - NHTSA Compliance
CONTINENTAL TIRE THE AMERICAS, LLC

Encl.

Attachment 1: List of Affected Products

Attachment 2: Part 573 noncompliance information report- 21 T019

Attachment 1

Continental Tire the Americas, LLC

List of Affected Products for 21T019

Brand	Tire Line	Tire Size	Production Date Begin	Production Date End	Tin Plant	TIN Size Code	TIN Type Code	DOT Week Start	DOT Week End
CONTINENTAL	ContiGo!	110/80 - 17 M/C 57H	2007-10-16	2021-10-13	H6	LO	VDE	4107	4121
CONTINENTAL	ContiGo!	110/80 - 17 M/C 57V	2007-10-16	2021-10-13	H6	LO	VDE	4107	4121
CONTINENTAL	ContiGo!	120/90 - 18 M/C 65H	2007-04-02	2021-10-13	H6	ID	VDE	1307	4121
CONTINENTAL	ContiGo!	120/90 - 18 M/C 65V	2007-04-02	2021-10-13	H6	ID	VDE	1307	4121
CONTINENTAL	ContiGo!	3.25 - 19 M/C 54H	2007-04-02	2021-10-13	H6	IN	VDE	1307	4121
CONTINENTAL	ContiLegend	140/90 - 16 M/C 71H	2016-12-12	2021-10-13	H6	VO	CJB	5016	4121
CONTINENTAL	ContiScoot	120/70-12 M/C 51P	2018-02-26	2021-02-22	H6	EN	FCS	0818	0821
CONTINENTAL	ContiScoot	130/70-12 M/C 62P	2018-04-16	2021-02-22	H6	4L	RCS	1518	0821
CONTINENTAL	ContiScoot	120/80-14 M/C 58S	2018-08-06	2021-02-22	H6	VX	FCS	3118	0821
CONTINENTAL	ContiScoot	150/70-13 M/C 64S	2018-10-15	2021-02-22	H6	L3	RCS	4118	0821
CONTINENTAL	ContiScoot	110/70-16 M/C 52S	2018-05-14	2021-02-22	H6	XX	FCS	1918	0821
CONTINENTAL	ContiScoot	130/70-16 M/C 61S	2018-05-14	2021-02-22	H6	BL	RCS	1918	0821
CONTINENTAL	ContiScoot	140/70-14 M/C 68S	2018-10-08	2021-02-22	H6	HJ	RCS	4018	0821
CONTINENTAL	ContiScoot	110/70-12 M/C 47P	2018-08-27	2021-02-22	H6	00	FCS	3418	0821
CONTINENTAL	ContiScoot	120/70-12 M/C 58P	2018-05-28	2021-02-22	H6	EN	RCS	2118	0821
CONTINENTAL	ContiScoot	90/90-14 M/C 46P	2018-07-02	2021-02-22	H6	AA	FCS	2618	0821
CONTINENTAL	ContiScoot	100/90-14 M/C 57P	2018-07-02	2021-02-22	H6	R9	RCS	2618	0821
CONTINENTAL	ContiScoot	110/90-13 M/C 56P	2018-07-16	2021-02-22	H6	93	FCS	2818	0821
CONTINENTAL	ContiScoot	110/70-13 M/C 48S	2018-07-16	2021-02-22	H6	73	FCS	2818	0821
CONTINENTAL	ContiScoot	130/70-13 M/C 63P	2018-05-14	2021-02-22	H6	S3	RCS	1918	0821
CONTINENTAL	ContiScoot	80/90-14 M/C 40P	2018-05-28	2021-02-22	H6	F9	FCS	2118	0821
CONTINENTAL	ContiScoot	90/90-14 M/C 52P	2018-08-27	2021-02-22	H6	AA	RCS	3418	0821
CONTINENTAL	ContiScoot	120/70-16 M/C 57P	2018-07-02	2021-02-22	H6	XC	FCS	2618	0821
CONTINENTAL	ContiScoot	140/70-15 M/C 69P	2018-10-08	2021-02-22	H6	V7	RCS	4018	0821
CONTINENTAL	ContiScoot	120/70-14 M/C 55P	2018-05-14	2021-02-22	H6	HK	FCS	1918	0821
CONTINENTAL	ContiScoot	140/60-13 M/C 63P	2019-05-06	2021-02-22	H6	B3	RCS	1819	0821
CONTINENTAL	ContiScoot	100/80-16 M/C 50P	2018-07-02	2020-09-24	H6	HA	FCS	2618	3820
CONTINENTAL	ContiScoot	120/80-16 M/C 60P	2018-08-06	2021-02-22	H6	LF	RCS	3118	0821
CONTINENTAL	ContiScoot	120/70-13 M/C 53P	2018-10-22	2021-02-22	H6	R2	FCS	4218	0821
CONTINENTAL	ContiScoot	120/70-15 M/C 56S	2018-07-02	2021-02-22	H6	V8	FCS	2618	0821
CONTINENTAL	ContiScoot	90/80-16 M/C 51P	2018-08-27	2021-02-22	H6	HE	FCS	3418	0821
CONTINENTAL	ContiScoot	110/80-14 M/C 59P	2018-11-12	2020-10-08	H6	97	RCS	4518	4020
CONTINENTAL	TKC 70	120/90 - 17 M/C 64T	2014-11-10	2021-10-13	H6	XB	CGJ	4514	4121
CONTINENTAL	TKC 70	130/80 - 17 M/C 65T	2014-10-06	2021-10-13	H6	9B	CGJ	4014	4121
CONTINENTAL	TKC 70	130/80 - 17 M/C 65T	2014-10-06	2021-10-13	H6	9B	CGJ	4014	4121
CONTINENTAL	TKC 70	4.00 - 18 M/C 64T	2015-02-09	2021-10-13	H6	Y2	CGJ	0615	4121
CONTINENTAL	TKC 70	100/90 - 19 M/C 57T	2014-10-06	2021-10-13	H6	HD	CGJ	4014	4121
CONTINENTAL	TKC 70	100/90 - 19 M/C 57T	2014-10-06	2021-10-13	H6	HD	CGJ	4014	4121
CONTINENTAL	TKC 70	90/90 - 21 M/C 54T	2014-11-10	2021-10-13	H6	25	CGJ	4514	4121
CONTINENTAL	TKC 70	90/90 - 21 M/C 54H	2017-11-27	2021-10-13	H6	25	CGJ	4817	4121
CONTINENTAL	TKC 70	3.00 - 21 M/C 51T	2015-01-19	2021-10-13	H6	24	CGJ	0315	4121
CONTINENTAL	TKV 11	100/90 - 19 M/C 57V	2007-03-05	2021-10-13	H6	IU	VAA	0907	4121
CONTINENTAL	TKV 12	110/90 - 18 M/C 61H	2015-10-14	2021-10-13	H6	IA	VAB	4115	4121



Tire Report

NHTSA ID: 21T019 Transaction ID: 21-00315-26954-10 (Original Report)

Required fields indicated with *

Manufacturer: Continental Tire the Americas, LLC	
1830 Macmillan Park Drive Fort Mill SC 29707	Harald Morgenstern Manager NHTSA Compliance 704-583-4877,

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

Tire Information	
CONTINENTAL ContiScoot 100/80-16 M/C SOP	
<p>* Tire Brand: CONTINENTAL</p> <p>* Tire Line: ContiScoot</p> <p>* Tire Size: 100/80-16 M/C SOP</p>	<p>Descriptive Information: Continental Tire the Americas, LLC (CTA) discovered one motorcycle tire with a non compliant symbol in the DOT TIN. This triggered CTA to perform a thorough search of all its tire sidewall specifications for the not allowed symbols "G,I,O,Q,S,Z". This search uncovered 43 motorcycle tire articles, all produced in the Shinko South Korea plant.</p>
<p>Production Dates Begin: 07/02/2018 End: 09/24/2020</p>	
Tire Identification Number (TIN)	
* Plant ID code: HA	* Size code: FCS
Optional code: 2618	* Beg. Date Code: 3820
	* End. Date Code: H6

Number potentially involved: 14198 Estimated percentage of involved with defect: 100%

Defect / Noncompliance Description	
<p>For this Defect/Noncompliance:</p> <p>* Describe the defect or noncompliance: The DOT tire identification number of the affected tires contain symbols which are not allowed according to "49 CFR 574.5 Tire identification requirements". Specifically, the letters "G", "I", "O", and "S" were used on these tires.</p> <p>If a noncompliance, provide the applicable FMVSS: 139 - New pneumatic radial tires for light vehicles</p> <p>If applicable, provide any further FMVSS affected:</p> <p>Describe the cause: The affected tires were produced by CTA's offtake partner (Shinko) in South Korea. Shinko was not aware that certain letters are not allowed to be used in the DOT TIN.</p>	<p>* Describe the safety risk: Inconsequential to Safety</p> <p>Identify any warning which can precede or occur:</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:	Last Name:
Address 1:	Position:
Address 2:	Email:
City:	Phone:
State:	
Zip/Postal Code:	

Involved Components
If the defect or noncompliance involves a specific component(s), identify that component(s) below.

Purchaser Information

Chronolog Defect / Noncompliance Determination

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

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):

j 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

A separate file will be uploaded to the portal with the details for all 43 affected products

Document Upload

There are 1 documents associated with this report.

Part 573 Safety Recall Report

21T-019

Manufacturer Name : Continental Tire the Americas, LLC**Submission Date :** DEC 02, 2021**NHTSA Recall No. :** 21T-019**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : Continental Tire the Americas, LLC

Address : 1830 Macmillan Park Drive

Fort Mill SC 29707

Company phone : 704-583-4882

Population :

Number of potentially involved : 14,198

Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : CONTINENTAL

Tire Line : ContiScoop

Tire Size : 100/80-16 M/C 50P

Descriptive Information : Continental Tire the Americas, LLC (CTA) discovered one motorcycle tire with a non compliant symbol in the DOT TIN. This triggered CTA to perform a thorough search of all its tire sidewall specifications for the not allowed symbols "G,I,O,Q,S,Z". This search uncovered 43 motorcycle tire articles, all produced in the Shinko South Korea plant.

Production Dates : JUL 02, 2018 - SEP 24, 2020

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
H6	HA	FCS	2618	3820

Description of Noncompliance :

Description of the Noncompliance : The DOT tire identification number of the affected tires contain symbols which are not allowed according to "49 CFR 574.5 Tire identification requirements". Specifically, the letters "G", "I", "O", and "S" were used on these tires.

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

FMVSS 2 : NR

Description of the Safety Risk : Inconsequential to Safety

Description of the Cause : The affected tires were produced by CTA's offtake partner (Shinko) in South Korea. Shinko was not aware that certain letters are not allowed to be used in the DOT TIN.

Identification of Any Warning NR
that can Occur :

Involved Components :

Component Name : NR

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

NR

Description of Remedy :

Description of Remedy Program : NR

How Remedy Component Differs NR
from Recalled Component :

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

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