

HONDA

American Honda Motor Co., Inc.
1919 Torrance Boulevard
Torrance, CA 90501-2746
Phone (310) 783-2000

July 14, 2021

Acting Administrator
Dr. Steven Cliff
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Part 556 Petition for Exemption of Inconsequential Noncompliance, 21V-465
2019 – 2021 Model Year Honda Monkey
Tire Marking

Dear Acting Administrator Dr. Cliff:

In accordance with the National Traffic and Motor Vehicle Safety Act and 49 CFR Part 556 Exemption for Inconsequential Defect or Noncompliance, Honda is submitting the enclosed Petition for Exemption of Inconsequential Noncompliance seeking an exemption from the customer notification and remedy requirements of 49 U.S.C. 301 "Motor Vehicle Safety Act" for the referenced Noncompliance Information Report due to the inconsequentiality as it relates to motor vehicle safety.

If you have any questions about this petition, please feel free to contact me.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.



Jeff Chang
Senior Manager
Product Regulatory Office

JC:rq

Enclosures: Petition for Exemption of Inconsequential Noncompliance
Noncompliance Information Report

PETITION FOR EXEMPTION OF INCONSEQUENTIAL NONCOMPLIANCE

556.4(b)(3)

Name and address of applicant: Jeff Chang
American Honda Motor Co., Inc. (Honda)
1919 Torrance Blvd.
Torrance, CA 90501-2746

Nature of organization: Vehicle Manufacturer, Corporation

Country of law: United States of America

556.4(b)(4)

Description of motor vehicle, including the number involved and period of production:

<u>Make/Model</u>	<u>Model Year</u>	<u>Dates of Manufacture</u>	<u>Number of Vehicles</u>
Monkey	2019	07/04/2018 to 05/27/2019	6,764
Monkey	2020	07/19/2019 to 04/03/2020	2,727
Monkey	2021	06/04/2020 to 04/02/2021	3,837

Noncompliance concerning which an exemption is sought:

On June 22, 2021, Honda filed a noncompliance information report (NHTSA ID 21V-465) stating that affected Vee Rubber tires were installed on 2019-2021MY Honda Monkey motorcycles. The affected tires were noncompliant due to extra markings between the manufacturer's code and production week mark within the Tire Identification Number (TIN). The extra markings result in the tires failing to meet the requirements of Federal Motor Vehicle Safety Standard (FMVSS) No. 119 - New pneumatic tires for motor vehicles with a GVWR of more than 4,536 kilograms (10,000 pounds) and motorcycles.

Vee Rubber Corporation Ltd. (VRC) filed a noncompliance information report (NHTSA ID 21T-009) on June 7, 2021 and submitted a petition for exemption of inconsequential noncompliance to the NHTSA Administrator on June 22, 2021.

556.4(b)(5)

Data, views, and arguments supporting the petition:

Honda supports VRC's petition for exemption of inconsequential noncompliance as we believe the extra markings on the tires do not pose a safety risk to riders of the affected motorcycles, do not affect the performance of the motorcycles tires and do not impact any requirements applicable to the tires beyond the tire marking requirements in FMVSS No. 119. Additionally, because the extra markings do not alter or remove any required identifying characters of the TIN, the tires remain identifiable and traceable. Thus, should the subject tires be involved in a future recall, all identifying information necessary to determine whether an affected tire is included within that future recall would be present.

In addition, the circumstances present here are similar to those in several prior petitions for exemption of inconsequential noncompliance relating to TIN marking noncompliances that NHTSA has granted, and thus a grant here would be appropriate. Notably:

- Michelin North America, Inc. – 85 Fed. Reg. 37495 (June 21, 2020): “The DOT symbol was incorrectly placed between the first and second grouping of the TIN when the symbol should be placed either in front of or below the TIN, thus, both the DOT symbol and the plant code were marked in the incorrect sequence.”
- Bridgestone Firestone North America Tire, LLC – 71 Fed. Reg. 4396 (Jan. 26, 2006): “The noncompliant tires are stamped HYMOLCM, while the correct stamping including the date of manufacture should be HYMOLCM2705.”
- Cooper Tire – 71 Fed Reg. 4396 & 4397 (Jan. 25, 2006): “The noncompliant tires were molded with the letters “4E” as the size designation. The correct stamping should have been “TY.””

As of the time of Honda’s noncompliance information report filed on June 22, 2021, Honda is not aware of any claims, complaints, injuries, incidents, or reports related to this noncompliance.

Based on the reasons stated above, Honda believes this noncompliance is inconsequential to motor vehicle safety and thus seeks an exemption from the Motor Vehicle Safety Act’s customer notice and remedy requirements.

NONCOMPLIANCE INFORMATION REPORT

573.6(c)(1)

Name of manufacturer: Thai Honda Manufacturing Co., Ltd.

Manufacturer's agent: Jeff Chang
American Honda Motor Co., Inc.
1919 Torrance Blvd.
Torrance, CA 90501-2746

573.6(c)(2)

Identification of potentially affected vehicles:

<u>Make/Model</u>	<u>Model Year</u>	<u>Dates of Manufacture</u>	<u>Number of Vehicles</u>
Monkey	2019	07/04/2018 to 05/27/2019	6,764
Monkey	2020	07/19/2019 to 04/03/2020	2,727
Monkey	2021	06/04/2020 to 04/02/2021	3,837

Description of the basis for the determination of the recall population:

The recall population was determined based on manufacturing records.

Description of how the vehicles being recalled differ from similar vehicles not included in the recall:

The vehicles referenced above were assembled with the affected tires which, according to the tire noncompliance notification filed by Vee Rubber Corporation Ltd. (VRC) (NHTSA ID 21T-009), contain extra markings between the manufacturer's code and production week mark within the tire identification number (TIN). Vehicles not included in the production ranges have been assembled with tires which have the correct TIN markings.

Identification of affected component:

Component	Part No.
Front Tire	42711-K0F-T02
Rear Tire	44711-K0F-T02

Country of Origin: Thailand
Manufacturer: Vee Rubber Corporation Ltd.

573.6(c)(3)

Total number of potentially affected vehicles: 13,328

573.6(c)(4)

Percentage of affected vehicles that contain the noncompliance: 100%

573.6(c)(5)

Noncompliance description:

According to the noncompliance notification filed by VRC, the affected tires contain extra markings between the manufacturer's code and production week mark within the tire identification number (TIN) which do not meet the requirements of S6.5 of Federal Motor Vehicle Safety Standards (FMVSS) No. 119 - New pneumatic tires for motor vehicles with a GVWR of more than 4,536 kilograms (10,000 pounds) and motorcycles.

573.6(c)(7)

Determination of noncompliance:

March 9, 2021

VRC advised Honda that tires installed on the Monkey motorcycle had incorrect TIN markings.

June 7, 2021

VRC submitted a noncompliance notification to NHTSA (NHTSA ID 21T-009).

June 15, 2021

Honda determined that a FMVSS noncompliance existed.

573.6(c)(8)(ii)

The date notification was sent to dealers: June 17, 2021

573.6(c)(8)(iii)

Intent to file a petition for an exemption from the recall requirements:

Honda is submitting to the agency, separately, a petition for an exemption from the notice and remedy provisions of the Safety Act, because Honda has concluded that this noncompliance is inconsequential to motor vehicle safety. Honda is removing all noncompliant tires under its control and dealers have been instructed to return non-compliant tires to Honda.

573.6(c)(11)

Manufacturer's campaign number: KM4

Part 573 Safety Recall Report

21V-465

Manufacturer Name : Honda (American Honda Motor Co.)**Submission Date :** JUN 22, 2021**NHTSA Recall No. :** 21V-465**Manufacturer Recall No. :** KM4**Manufacturer Information :****Population :**

Manufacturer Name : Honda (American Honda Motor Co.)

Number of potentially involved : 13,328

Address : 1919 Torrance Blvd.

Estimated percentage with defect : 100 %

Torrance CA 90501

Company phone : 1-888-234-2138

Vehicle Information :

Vehicle 1 : 2021-2021 Honda Monkey

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : The recall population was determined based on manufacturing records. The vehicles referenced above were assembled with the affected tires which, according to the tire noncompliance notification filed by Vee Rubber Corporation Ltd. (VRC) (NHTSA ID 21T-009), contain extra markings between the manufacturer's code and production week mark within the tire identification number (TIN). Vehicles not included in the production ranges have been assembled with tires which have the correct TIN markings. The number of affected units is 3,837.

Production Dates : JUN 04, 2020 - APR 02, 2021

VIN Range 1 : Begin :

NR

End : NR

 Not sequential

Vehicle 2 : 2019-2019 Honda Monkey

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : The recall population was determined based on manufacturing records. The vehicles referenced above were assembled with the affected tires which, according to the tire noncompliance notification filed by Vee Rubber Corporation Ltd. (VRC) (NHTSA ID 21T-009), contain extra markings between the manufacturer's code and production week mark within the tire identification number (TIN). Vehicles not included in the production ranges have been assembled with tires which have the correct TIN markings. The number of affected units is 6,764.

Production Dates : JUL 04, 2018 - MAY 27, 2019

VIN Range 1 : Begin :

NR

End : NR

 Not sequential

Vehicle 3 : 2020-2020 Honda Monkey

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : The recall population was determined based on manufacturing records. The vehicles referenced above were assembled with the affected tires which, according to the tire noncompliance notification filed by Vee Rubber Corporation Ltd. (VRC) (NHTSA ID 21T-009), contain extra markings between the manufacturer's code and production week mark within the tire identification number (TIN). Vehicles not included in the production ranges have been assembled with tires which have the correct TIN markings. The number of affected units is 2,727.

Production Dates : JUL 19, 2019 - APR 03, 2020

VIN Range 1 : Begin :

NR

End : NR

Not sequential

Description of Noncompliance :

Description of the Noncompliance : According to the noncompliance notification filed by VRC, the affected tires contain extra markings between the manufacturer's code and production week mark within the tire identification number (TIN) which do not meet the requirements of S6.5 of Federal Motor Vehicle Safety Standards (FMVSS) No. 119 - New pneumatic tires for motor vehicles with a GVWR of more than 4,536 kilograms (10,000 pounds) and motorcycles.

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

FMVSS 2 : NR

Description of the Safety Risk : Honda is submitting to the agency, separately, a petition for an exemption from the notice and remedy provisions of the Safety Act, because Honda has concluded that this noncompliance is inconsequential to motor vehicle safety. Honda is removing all noncompliant tires under its control and dealers have been instructed to return non-compliant tires to Honda.

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Involved Components :

Component Name 1 : Front Tire

Component Description : Front Tire

Component Part Number : 42711-K0F-T02

Component Name 2 : Rear Tire

Component Description : Rear Tire

Component Part Number : 44711-K0F-T02

Supplier Identification :

Component Manufacturer

Name : Vee Rubber Corporation Ltd.

Address : 3602 Browns Mill Road SE
Atlanta Foreign States 30354

Country : Thailand

Chronology :

March 9, 2021

VRC advised Honda that tires installed on the Monkey motorcycle had incorrect TIN markings.

June 7, 2021

VRC submitted a noncompliance notification to NHTSA (NHTSA ID 21T-009).

June 15, 2021

Honda determined that a FMVSS noncompliance existed.

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 : NR

Recall Schedule :

Description of Recall Schedule : Dealer notification began on June 17, 2021.

Planned Dealer Notification Date : JUN 22, 2021 - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported