

**SUBMISSION OF INCONSEQUENTIAL NONCOMPLIANCE PETITION
(WITH ATTACHMENT A)**

NHTSA ID: 22T011

Recall Subject: Missing Sidewall DOT Symbol/FMVSS 139/Petition

Manufacture: PREMIORRI LLC

Accepted Date: 06/28/2022

ATTACHMENT A

1. Manufacturer Identification:

The full name - **LIMITED LIABILITY COMPANY «PREMIORI»**

Address of the applicant - **91, Levanevskogo Street, Bila Tserkva, 09100**

The nature of its organization - **Legal person / LIMITED LIABILITY COMPANY**

The name of the state or Country under the law of which it is organized - **Ukraine**

2. Noncompliance:

The replacement equipment - **tire sidewall markings**

The period of production – **from 02/07/2021 to 04/30/2021**

The number involved – **8 (eight) / less than 1%**

The noncompliance concerning which an exemption is sought - **the tires lacked the DOT symbol and full or partial tire identification number on one sidewall**

3. Statement of Request:

The company PREMIORI LLC, Ukraine is requesting an exemption from the recall notification and remedy requirements under 49 U.S.C. §§ 30118 and 30120

4. Population:

Full identifying information of the tires - **175/65R14 82H PREMIORRI Solazo**

Make – **PREMIORRI Solazo**

Model - **Solazo**

Tire size - **175/65R14 82H**

Production dates (beginning to end) - **from 02/07/2021 to 04/30/2021**

Number potentially involved (**8 (eight)**)

DOT KC F1 0821

DOT KC F1 0821

DOT KC F1 1021

DOT KC F1 1221

DOT KC F1 1221

DOT KC F1 1621

DOT KC F1 1621

DOT KC F1 1821

5. Chronology:

February 17, 2022 We receipt for the noncompliance of the Request No. OA-139-211022 from the US Department of Transportation

February 18, 2022 The Technical Service of the manufacturer PREMIORI LLC carried out a complete analysis of the sidewall marking of the available molds for the subject tires. We found one mold of this size of tires

February 19, 2022 We have corrected this noncompliance

February 20, 2022 After investigating the reasons for this noncompliance and consulting with the technical service of the company, it was concluded that this did not affect the safety of vehicles

March 10, 2022 We sent the answer to the Request for each sub-item separately, indicating the relevant sources of information and attached files by e-mail Mr. Lindley

6. Cause:

Untimely detection of noncompliance of the sidewall marking of the tires

7. Safety Risk(s):

With regard to the marking of the subject tires PREMIORRI Solazo according to FMVSS No. 139, Section S5.5, each tire is marked with the information specified in S5.5 (a) - (i). The marking is in letters and numbers at least 0.078 inches high and placed at least 0.015 inches above the tire surface

(a) DOT symbol: KC F1 0822;

(b) tire size designation: 175/65R14;

(c) maximum permissible inflation pressure: 300 kPa (44 psi);

(d) maximum tire load: 475 kg (1047 lbs);

(e) general name of each cord material used for the tire plies (both sidewall and thread): POLYESTER, STEEL, NYLON;

(f) actual number of sidewall plies: 1 POLYESTER and actual number of tread plies: 2 STEEL + 1 NYLON;

(g) "TUBELESS": tubeless tire;

(h) "RADIAL": the subject tire is a radial design tire;

(i) no alpine symbol, as the subject tire is a road tread tire.

Each tire is marked with a trademark: PREMIORRI Solazo manufacturer name.

The company PREMIORI LLC assumes that in this case there is a single risk associated with noncompliance, and it concerns the misleading of the consumer regarding the DOT marking on one side of the sidewall of the tire.

8. Justification:

The Technical Service of the manufacturer PREMIORI LLC carried out a complete analysis of the sidewall marking of the available molds for the subject tires.

In total, we have 4 (four) molds for this tire size. We have found one (1) mold with DOT marking on one sidewall.

To confirm this, we can provide a photo with markings of the subject tire 175/65R14 PREMIORRI Solazo on both sidewall.

9. Actions:

We have taken corrective actions regarding this noncompliance.

At this moment the marking of both sidewall meets the requirements, that is, DOT symbol as a full tire identification number is on one sidewall, and DOT symbol as a partial identification number is on the other sidewall.

To confirm this, we can provide a photo with markings of the subject tire 175/65R14 PREMIORRI Solazo on both sidewall.

10. Conclusion:

Therefore, the company PREMIORI LLC assumes that in this case there is a single risk associated with noncompliance, and it concerns the misleading of the consumer regarding the DOT marking on both sides of the sidewall of the tire. However, this noncompliance does not relate to motor vehicle safety.

11. Contact Information:

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91, Levanevskogo Street, Bila Tserkva, 09100

Part 573 Safety Recall Report

22T-011

Manufacturer Name : PREMIORI LLC**Submission Date :** JUN 28, 2022**NHTSA Recall No. :** 22T-011**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : PREMIORI LLC

Address : Levanevskogo street 91
10903 NW 122nd ST, Medley,
FLORIDA Bila Tserkva, Kyiv region 00
09100

Company phone : (305)663-3508

Population :

Number of potentially involved : 8

Estimated percentage with defect : 1 %

Tire Information :

Tire Brand 1 : PREMIORRI

Tire Line : Solazo

Tire Size : 175/65R14 82H

Descriptive Information : The tires lacked the full DOT symbol on one sidewall

Production Dates : FEB 07, 2021 - APR 30, 2021

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
KC	F1	NR	08	21

Description of Noncompliance :

Description of the Noncompliance : The tires lacked the DOT symbol and full or partial tire identification number on one sidewall

FMVSS 1 : 109 - New pneumatic and certain specialty tires

FMVSS 2 : NR

Description of the Safety Risk : This noncompliance does not relate to motor vehicle safety

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Involved Components :

Component Name : tire sidewall markings

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : PREMIORI LLC

Address : Levanevskogo street, 91 building

10903 NW 122nd ST, Medley, FLORIDA Bila Tserkva Foreign States 09100

Country : Ukraine

Chronology :

This noncompliance became known upon receipt of a request from the US Department of Transportation. We found one mold of this size of tires. We have corrected this noncompliance. After investigating the reasons for this noncompliance and consulting with the technical service, it was concluded that this did not affect the safety of vehicles.

Description of Remedy :

Description of Remedy Program : We corrected all the tires in our possession and destroyed at in our possession dealers

How Remedy Component Differs from Recalled Component : tire sidewall markings

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

Recall Schedule :

Description of Recall Schedule : We state that we do not feel it posses a safety risk to owners so we will not be mailing to owners pending NHTSA's review

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

Part 573 Safety Recall Report

22T-011

Manufacturer Name : PREMIORI LLC**Submission Date :** OCT 27, 2022**NHTSA Recall No. :** 22T-011**Manufacturer Recall No. :** NR**Manufacturer Information :**

Manufacturer Name : PREMIORI LLC

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Production Dates : FEB 07, 2021 - APR 30, 2021

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
KC	F1	NR	08	21

Description of Noncompliance :

Description of the Noncompliance : The tires lacked the DOT symbol and full or partial tire identification number on one sidewall

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

FMVSS 2 : NR

Description of the Safety Risk : This noncompliance does not relate to motor vehicle safety

Description of the Cause : NR

Identification of Any Warning that can Occur : NR

Involved Components :

Component Name : tire sidewall markings

Component Description : NR

Component Part Number : NR

Supplier Identification :

Component Manufacturer

Name : PREMIORI LLC

Address : Levanevskogo street, 91 building

10903 NW 122nd ST, Medley, FLORIDA Bila Tserkva Foreign States 09100

Country : Ukraine

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Recall Schedule :

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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