



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

1200 New Jersey Avenue SE
Washington, DC 20590

July 29, 2015

Eric Unis
Hercules Tire & Rubber Company
875 Third Avenue
New York, NY 10022

NVS-215KS
15T-011

Subject: Tread Separation

Dear Eric Unis:

This letter serves to acknowledge Hercules Tire & Rubber Company's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

HERCULES/ALL TRAC A/T/235/70R16 106T
HERCULES/ALL TRAC A/T/235/75R15 109T XL
HERCULES/ALL TRAC A/T/245/70R16 107T
HERCULES/ALL TRAC A/T/255/70R16 111T
HERCULES/ALL TRAC A/T/265/70R16 112T
HERCULES/ALL TRAC A/T/265/75R16 116T
HERCULES/ALL TRAC A/T/275/70R16 114T

Mfr's Report Date: July 7, 2015

NHTSA Campaign Number: 15T-011

Components:

TIRES:TREAD/BELT

Potential Number of Units Affected: 90,000

Problem Description:

Hercules Tire & Rubber Company (Hercules) is recalling certain All Trac A/T tires, sizes 235/70R16 106T, 235/75R15 109T XL, 245/70R16 107T, 255/70R16 111T, 265/70R16 112T, 265/75R16 116T and 275/70R16 114T. The affected tires may experience a tread separation.

Consequence:

A tire tread separation may result in sudden air loss, increasing the risk of a vehicle crash.

Remedy:

Hercules will notify owners, and dealers will replace the tires, free of charge. The recall is expected to begin in August 2015. Owners may contact Hercules customer service at 1-888-943-2402. Hercules number for this recall is 01-2015.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

Hercules' Defect Information Report is ambiguous as to whether it has made a defect decision and contains language that could be construed to mean it is disclaiming the existence of a safety defect. To the extent it was Hercules' intention to disclaim the existence of a safety defect, please be reminded that any such statements have no force or effect in terms of Hercules' obligation to undertake and complete the recall and NHTSA does not agree with it. We remind Hercules that it must issue owner and purchaser notifications in full compliance with 49 CFR Part 577, and specifically 49 CFR 577.5.

We have received Hercules' proposed owner notification letter and it is currently under review. You will be notified of any changes or concerns once our review is complete.

Please be reminded of the following requirements:

Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

Please be reminded that under 49 U.S.C. § 30112(a)(3), it is illegal for a manufacturer, to sell, offer for sale, import, or introduce or deliver into interstate commerce, a motor vehicle or item of motor vehicle equipment that contains a safety defect once the manufacturer has notified NHTSA about that safety defect. This prohibition does not apply once the motor vehicle or motor vehicle equipment has been remedied according to the manufacturer's instructions.

As required in Part 573.6(c)(6), in the case of a defect, please amend your provided chronology to include the dates of all of the principal events that were the basis for the determination that the defect related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information, with their dates of receipt.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at kelly.schuler@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement