



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

1200 New Jersey Avenue SE  
Washington, DC 20590

October 8, 2015

Mr. John Emerson  
Director  
Michelin North America, Inc.  
515 Michelin Road  
P.O. Box 1987  
Greenville, SC 29602

NVS-215KS  
15T-020

**Subject:** Lack of DOT Symbol/FMVSS 119/Petition

Dear Mr. Emerson:

This letter serves to acknowledge Michelin North America, Inc.'s, notification to the National Highway Traffic Safety Administration (NHTSA) of a noncompliance with Federal Motor Vehicle Safety Standard number 119, "New Pneumatic Tires for Vehicles Other Than Passenger Cars." Please review the following information to ensure that it conforms to your records. If the information does not agree with your records, please contact us immediately to discuss your concerns.

**Makes/Models/Model Years:**

MICHELIN/X WORKS/XZY/315/80R22.5 156/150K/9999

**NHTSA Campaign Number:** 15T-020

**Mfr's Report Date:** September 18, 2015

**Components:** TIRES:MARKINGS

**Potential Number of Units Affected:** 247

**Summary:** Michelin (Michelin North America, Inc.) has notified NHTSA that certain models Michelin X Works XZY, size 315/80R22.5 156/150K, manufactured from January 1, 2011, to July 31, 2015 fail to conform to 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." The affected tires lack the required DOT symbol and load range letter designation.

**Consequence:**

See Notes

**Remedy:**

See Notes

**Notes:**

The manufacturer is petitioning NHTSA for a determination that this matter is inconsequential to motor vehicle safety. The manufacturer is not obligated to conduct an owner notification and remedy campaign until NHTSA has resolved this petition. If the petition is denied, the manufacturer will be notified and must then undertake its notification and remedy campaign obligations.

Under 49 U.S.C. § 30112(a), it is illegal for anyone, including a manufacturer, distributor, dealer, or retailer to sell an item of equipment or vehicle that fails to comply with all applicable Federal motor vehicle safety standards.

Your contact for this recall will be Kelly Schuler who may be reached by phone at 1-202-366-5227, or by email at [Kelly.Schuler@dot.gov](mailto:Kelly.Schuler@dot.gov). We look forward to working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Timian". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

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