

Safety Defect and Noncompliance Report Guide for Equipment

PART 573 Defect and Noncompliance Report

Date: 04/26/2017

This report serves as American Kenda Rubber's notification to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a "defect related to motor vehicle safety" exists in certain New Pneumatic Tires of Rubber. The manufacturer, Kenda Rubber Industrial, has decided that this defect, existed in these tires on week 51 and week 52 of the year 2016 and specifically manufacture dates 12/23/16 – 12/26/16.

I. Manufacturer, Designated Agent, and Other Chain of Distribution Information

Manufacturer's corporate name: Kenda Rubber Industrial Company Ltd.

Equipment's brand or trademark
name owner(s) (where applicable): Kenda Kenetica

Designated Agent
(imported equipment): American Kenda Rubber Industrial Company Ltd.
7095 Americana Parkway, Reynoldsburg, OH 43068

If this notification concerns, equipment that was installed in new motor vehicles or new items of motor vehicle equipment, identify by name, address, and telephone number each vehicle manufacturer and equipment manufacturer who purchased that equipment: **N/A**

If this notification concerns a defective or noncompliant component that the above identified manufacturer did not manufacture, identify that component and provide the name, address, and phone number of the manufacturer of the component (if this manufacturer is unknown, provide this information as to the supplier of the component): **N/A**

Name, address, email, and phone and fax numbers for the person(s) to whom inquiries about this report should be directed:

Thomas A. Williams, VP of Engineering
5801 Mayfair Road
North Canton, OH 44720
Email: TWilliams@kendausa.com
Phone: (330) 526-0576
Fax: (330) 494-0955

Manufacturer's assigned campaign number (where applicable): **N/A**

II. Identification of the Recall Population and Its Size

Complete the tables below for each item of equipment subject to this notification. Additional tables may be necessary where there are more than three items subject to a notification.

Type of equipment: New Pneumatic Tires of Rubber
Part/Model number: 170018
Size and function: P235/75R15 105S KR17
Inclusive dates of manufacture: 12/23/2016 – 12/26/2016

Other information necessary to describe this equipment:

DOT codes: K3D5ANA5116 and K3D5ANA5216
Set-Up Manufacturer ID's:

9259 6122301	9226 6122301
9259 6122401	9226 6122401
9259 6122501	9226 6122501
9259 6122601	9226 6122601

Total number of items of equipment: 696 tires shipped to three distributor locations

Provide the following information as to all the items of equipment (“the recall population”) identified above:

Grand total number of items of equipment in the recall population: 696

<u>Tires Shipped to</u>	<u>Quantity Shipped</u>
Tulsa, OK	543
Westhampton, NJ	<u>153</u>
	696

The percentage of the recall population you estimate actually contain the defect or noncompliance: 77.9%

Identify and describe how the recall population was determined (e.g., on what basis the recalled models were selected and how the inclusive dates of manufacture were determined):

Quality control sampling was performed and a “void” was found above the top belt of the tires due to the tires being built out of specification. The top belt splice in these tires overlap, which is a non-standard situation. This overlap caused trapped air, which created the “void” above the belt.

Based on the production dates and operator identification, the manufacturer was able to determine which tires were out of specification. Dates of manufacture were tracked through

machine set-up records. Distribution of tires to dealers & distributors were tracked through shipping records.

Describe how the recall population is different from any similar items of equipment not subject to this notification:

The top belt splice in these tires do not overlap, but meet at the ends in accordance with the proper specifications.

III. Description of the Defect or Noncompliance and Chronology of Events

Describe the defect or noncompliance, including a summary and detailed description of the nature and physical location (if appropriate) of the defect or noncompliance. Graphic aids should be provided where necessary.

The defect is a “void” in the tire between the top steel belt and tire undertread located at the overlapped steel belt splice.



Describe the cause(s) of the defect or noncompliance condition.

The cause of the defect is improper machine set-up.

Describe the consequence(s) of the defect or noncompliance condition.

The “void” area could grow as the tires are in repeated use and develop into a tread separation under selected usage conditions.

Identify any warning(s) that may precede the defect or noncompliance condition.

For the consumer, there would be no noticeable indication of the void as manufactured. However, a vibration issue would become noticeable by the consumer, over time should a tread separation develop.

For defects, provide a dated, chronological summary of all the principle events that were the basis for the determination that the defect is related to motor vehicle safety, including a summary of all warranty claims, field or service reports, and other information such as numbers of crashes, injuries and fatalities.

There have been no reported incidents at this time such as crashes, injuries, or fatalities. The tires were manufactured between 12/23/16 and 12/26/16 and the void was found. Durability testing completed on 1/17/17 on tires containing the void indicated that the void did not cause a tread separation. Recall is being initiated as a preventative measure.

For noncompliance's, identify the test results and other information considered in determining the existences of the noncompliance, and provide the date of each test and observation indicative of that noncompliance.

N/A

IV. The Remedy Program and Its Schedule

Describe the program for remedying the defect or noncompliance, including the plan for reimbursing those owners and purchasers who have incurred costs to remedy the defect or noncompliance before receiving the manufacturer's notification concerning that defect or noncompliance. Also include, where applicable, details with dates concerning any production remedy that was conducted or will be conducted.

Consumers having tires with DOT codes K3D5ANA5116 and K3D5ANA5216 will be instructed to contact American Kenda Rubber. They will be provided written instructions for going to their local dealer for inspection and verification of the manufacturer identification number. The consumer will present to the dealer the written instructions for the inspection and reimbursement to the dealer. The dealer should follow the instructions for inspection, reporting details, destruction of defective tires, and reimbursement by American Kenda Rubber.

The remedy program will basically consist of tire replacement at no cost to the consumer, if the tires have the manufacturer identification numbers in question. If the tires do not have the manufacturer identification numbers in question, the tires will not be replaced, and the inspection will be of no cost to the consumer.

Due to the recent manufacture date, the tires should not have accumulated enough wear to exhibit any issues due to the defect. Additionally, there have been no reported incidents of consumers having incurred costs due to the defect. However, consumers who can demonstrate incurred costs directly related to the defect will be reimbursed.

As for production remedy, the machine set-up was corrected on 12/27/16 and retraining of operators was completed.

Provide the estimated date(s) on which owner and purchaser notifications will be issued and the estimated date(s) for completion of those notifications.

Owner and purchaser notifications are projected to be issued during second quarter of 2017.

Provide the estimated date(s) on which dealer and distributor notification will be issued and the estimated date(s) for completion of those notifications.

Dealers and distributors were notified early January 2017 and were provided instructions for returning the shipment of tires to American Kenda Rubber for inspection. To date the majority of the tires have been returned and quarantined by American Kenda Rubber.

Describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The recalled component (tires) will have DOT codes K3D5ANA5116 and K3D5ANA5216. The remedy component (tires) will have DOT codes K3D5ANA5116 and K3D5ANA5216 **AND** the set-up manufacturer identification described in Section II Identification of the recall population and its size.

Attachment: See Exhibits 1 & 2