

Part 573 Noncompliance Report

Date: August 17, 2017

This report serves as notification by Trek Tire, LLC to the U.S. Department of Transportation, National Highway Traffic Safety Administration that a noncompliance with Federal Motor Vehicle Safety Standards exists in certain Dunlop Grandtrek PT3A tires.

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

Manufacturer's corporate name: *Sumitomo Rubber Industries, Ltd.*

Equipment's brand or trademark name owner(s) (where applicable): *Dunlop*

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

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II. Identification of the Recall Population and Its Size

Type of Equipment: <i>Tire</i>
Part/Model No.: <i>Dunlop Grandtrek PT3A</i>
Size: <i>275/50R21</i>
Manufacturing Site: <i>Miyakonojo City, Japan</i>
Total number: <i>1,400+/-</i>

Grand total number of items of equipment in the recall population: *300+/-*

The percentage of the recall population you estimate are actually noncompliant: *100%*

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):

Approximately 300 of these tires were sold and installed on vehicles before the noncompliance was identified; the remaining 1,100+/- tires were not sold or installed on vehicles.

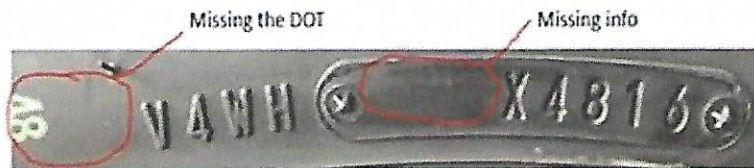
Describe how the recall population is different from any similar items of equipment not subject to this notification:

The recall population is limited to the owners of the vehicles on which approximately 300 of these tires were installed; the remaining 1,100+/- noncompliant tires were not and will not be sold or installed on vehicles in the United States.

III. Description of the Noncompliance and Chronology of Events

Describe the 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 tires in question lack complete DOT identification markings; they bear markings identifying the manufacturer, size and production date, but those markings do not include any DOT prefix. An example of the markings on these tires is shown below:



The tires were manufactured at Sumitomo Rubber Industries, Ltd.'s facility in Miyakonojo City, Japan, which we believe to be certified for the manufacture of tires intended for sale in the United States; we further believe that the tires satisfy applicable United States motor vehicle safety standards with the exception of the marking deficiency described above.

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

Improper or incomplete DOT number markings.

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

The tires lack complete DOT identification markings, but it is believed that they otherwise satisfy applicable United States motor vehicle safety standards. Therefore, we believe that the noncompliance is inconsequential.

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

Not applicable: the noncompliance relates to identification number markings that are readily visible on the tires.

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.

Not applicable; no known defect.

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

The noncompliance relates to identification number markings that are readily visible on the tires; no testing was necessary to identify that noncompliance.

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 may 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.

We believe that notwithstanding the lack of complete DOT identification markings, the tires otherwise satisfy applicable United States motor vehicle safety standards and therefore the noncompliance is inconsequential. Accordingly, we intend to file a Petition for Inconsequentiality seeking exemption from National Traffic and Motor Vehicle Safety Act's public notification and free remedy requirements. If such petition is denied, we and Dealer Tire LLC propose to replace the noncompliant tires at no cost to the end users, and to provide \$100 in compensation to each of those end users whose noncompliant tires are replaced.

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

Notification issuance and completion dates will be determined in the event that our Petition for Inconsequentiality is denied.


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

Trek Tire, LLC (the tires' distributor) and Dealer Tire LLC (the tires' dealer) are already aware of the noncompliance; no further distributor or dealer notification is necessary.

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

The recalled tires lack complete DOT identification markings; any remedy tires will bear complete DOT identification markings.

TREK TIRE, LLC

By 
Joseph Cote, its President

cc: Dealer Tire LLC