

## NONCOMPLIANCE INFORMATION REPORT

**Manufacturer Name:** LLIT (Thailand) Co., Ltd.  
**Importer Name:** American Pacific Industries, Inc.  
**Submission Date:** June 9, 2020  
**NHTSA Recall No.:** [TO BE ASSIGNED]  
**Manufacturer Recall No.:** N/A

### Manufacturer Information

**Manufacturer Name:** LLIT (Thailand) Co., Ltd.  
**Address:** 911/9 Moo 5  
Hemaraji Eastern Seaboard Industrial Estate  
Sriracha, Chon Buri, 20110 Thailand  
**Company Phone:** 66-381-09012

### Importer Information

**Importer Name:** American Pacific Industries, Inc.  
8320 East Hartford Drive  
Scottsdale, AZ 85255

### Population

**Total number of potentially affected items of equipment:** 1226 tires  
**Percentage of affected items of equipment that contain the noncompliance:** 100%

### Tire Information

**Tire Brand 1:** Gladiator Tires  
**Tire Line:** X-Comp A/T  
**Tire Size:** LT285/75R16 Load Range E

### **Descriptive Information:**

The affected population are certain light truck tires produced from February 12, 2018 (M code 0718) through January 26, 2020 (M code 0420).

**Production Dates:** February 12, 2018 (M code 0718) through January 26, 2020 (M code 0420).

### TIN (Tire Identification Number)

<u>Plant ID</u>	<u>Size code</u>	<u>Optional Code</u>	<u>Begin M Code</u>	<u>End M Code</u>
1YC	UVXAT6		0718	0420

**Description of Noncompliance**

**Description of the Noncompliance:** LLIT advised API that tires not meeting minimum levels of safety performance as required by FMVSS No. 139, New Pneumatic Radial Tires for Light Vehicles, 49 C.F.R. 571.139, may experience a loss of inflation pressure.

**FMVSS 1:** 139 – New Pneumatic Radial Tires

**Description of the Safety Risk:** LLIT has determined that the non-compliance may, under certain conditions, contribute to separation of the tire sidewall and thereby increase the risk of a crash.

**Description of the Cause:** LLIT (Thailand) Co. Ltd. has determined that certain Gladiator brand X Comp A/T LT285/75R16 E tires, set forth in the affected population in this report, may not comply with FMVSS No. 139, New Pneumatic Radial Tires for Light Vehicles, 49 C.F.R. 571.139 section S6.3.2 (a) Performance requirements.

**Identification Of Any Warning That Can Occur:** N/A

**Supplier Identification**

**Component Manufacturer**

**Name:** LLIT (Thailand) Co., Ltd.

**Address:** 911/9 Moo 5

Hemaraji Eastern Seaboard Industrial Estate  
Sriracha, Chon Buri, 20110 Thailand

**Chronology**

Early January 2020: LLIT (Thailand) was contacted by the Office of Vehicle Safety Compliance (OVSC) regarding an alleged noncompliance of certain Gladiator X Comp tires during FMVSS No. 139 testing in October 2019 by one of its contracted third-party laboratories. That testing raised potential sidewall separation concerns when subjected to FMVSS No. 139's endurance testing.

January 2020 – June 2020: LLIT (Thailand) promptly investigated the matter, consulted with the tires' importer of record, American Pacific Industries, Inc. (API), and cooperated with OVSC throughout Winter and Spring 2020.

June 1, 2020: OVSC identified additional testing conducted by a third-party laboratory, conducted on or about January 24, 2019 and January 9, 2020 respectively. This was new information to LLIT (Thailand). LLIT (Thailand) promptly analyzed the newly provided data, which identified an apparent noncompliance condition leading to lower sidewall separation when the tire was subjected to the endurance test of FMVSS No. 139. LLIT (Thailand) contemporaneously provided

that new information to API. On June 3, 2020, LLIT decided that a noncompliance with FMVSS No. 139 existed for certain tires imported into the US and notified API of that decision.

### **Description of Remedy**

**Description of Remedy Program:** Although the noncompliance decision was made by LLIT, API will conduct a recall for all non-compliant LLIT tires on behalf of LLIT and replace them with new tires that comply with FMVSS No 139.

API will contact registered customers that purchased tires of the specified date range by first class mail. For those customers who did not register their tires, API will work with independent dealers or distributors to obtain owner information, where available. In accordance with Part 577, customer correspondence will explain the issue, and include instructions on how to obtain replacement tires, as well as instructions for collecting reimbursement for remedies made prior to the recall, if any. Customers who have had their tires replaced before this recall may be eligible to receive reimbursement for the cost of obtaining a pre notification remedy of the problem associated with this recall.

Dealers performing the replacement of recalled tires will be notified of their responsibilities in accordance with 49 CFR part 573.6(c)(9). Dealers will then file warranty credit claims via the API portal. Tires to be disposed of after removal of DOT serial number.

### **How Remedy Component Differs from Recalled Component:**

API is informed that the FMVSS No. 139 compliant remedy tires will have a different carcass structure, with improved lower sidewall integrity that further mitigates risks of potential lower sidewall separation.

**Identify How/When Recall Condition was Corrected in Production:** The last date of manufacture for tires in the affected recall population was January 26, 2020 (M code 0420). API understands that tires manufactured after that date have a different carcass structure, which, according to LLIT, provides improved lower sidewall integrity that further mitigates risks of potential lower sidewall separation.

### **Recall Schedule**

**Description of Recall Schedule:** Upon approval by NHTSA Recall Management Division, appropriate importer(s), dealers and owner notification letters will be mailed no later than 60 days after submission of this report.

**The estimated date to start notification to dealers:** TBD

**The estimated date to start notifications to owners:** TBD

All factual information contained in this report regarding the identification of the noncompliance, the percentage of tires containing the noncompliance, the cause of the noncompliance, the chronology of events, and how the remedy tires will differ from the recalled tires was provided to API by LLIT for use in this report.