

Sumitomo Rubber Industries, Ltd.
Chronology of Noncompliance Determination

August 17, 2020: SRI's Quality Assurance Department in Japan initiated an investigation into the cause and potential performance impact of deformations observed in the bead area of returned tires in the Japanese market.

August 17 to September 24, 2020: Examinations of the returned tires and SRI's production records indicated that joint-tape rubber, which is used during the tire-building process to join the two ends of the inner liner, may have been misplaced in certain tires. Additionally, due to a change in the joint-tape composition, the rubber's adhesiveness was altered. As a result, the joint-tape rubber may protrude beyond the designated area for the joint-tape rubber. Production records indicated that these factors coexisted at SRI's Shirakawa plant January 24, 2020 through June 2, 2020 and at the SRI's Miyazaki's plant May 22, 2020 through June 9, 2020.

SRI manufactured test tires with the joint tape misplaced (for testing purposes only) to replicate and test the condition and evaluate any potential performance or safety impact due to this condition.

SRI reviewed shipping records to determine where potentially affected tires were shipped, including (i) the extent to which these tires left SRI's possession and (ii) the markets they were shipped to.

September 25 to September 30, 2020: To evaluate the potential implications under US safety standards, SRI conducted endurance tests under FMVSS 119 of "test" tires manufactured to replicate the joint-tape issue.

October 2 to October 16, 2020: SRI finalized the test report and evaluated the results of its testing. Based on the test report, the issue was elevated to Chief of Quality Assurance.

October 19, 2020 to November 4, 2020: SRI conducted a legal/regulatory review to evaluate whether the deformation may constitute a noncompliance under FMVSS 119.

November 4, 2020: Based upon the information provided by SRI's quality team, SRI's executive management determined that the subject tires do not comply with FMVSS 119 S6.1.2(a) and determined to file a noncompliance notice and petition for inconsequentiality.

December 4, 2020: SRI submitted a Petition for Determination of Inconsequential Noncompliance pursuant to the National Traffic and Motor Vehicle Safety Act (Safety Act), 49 U.S.C. §§ 30118(d) and 30120(h) and 49 C.F.R. Part 556, for an exemption from the notice and remedy requirements of 49 U.S.C. §§ 30118 and 30120, on the ground that the noncompliance to which this petition relates is inconsequential to motor vehicle safety. Docket No. NHTSA-2020-0117.

April 13, 2022: NHTSA notified SRI that it would be denying its petition for inconsequential noncompliance.

April 18, 2022: NHTSA's notice denying SRI's petition for inconsequential noncompliance was published in the Federal Register. 87 Fed. Reg. 23020 (Apr. 18, 2022).

April 20, 2022: SRI amended its initial noncompliance report (assigned Recall No. 20T020) with the applicable remedy information.

May 2022: NHTSA requested that SRI file a new Part 573 report.

May 6, 2022: Per NHTSA's request, SRI filed a new Part 573 report.

There have been no reports of tire failure, air loss, accidents, or injuries related to this condition.