

BRIDGESTONE FIRESTONE NORTH AMERICAN TIRE, LLC

535 Marriott Drive
Nashville, TN 37214

September 12, 2008

Mr. Daniel Smith
Associate Administrator of Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

Re: Notification of Noncompliance, 315/80R22.5 Load Range 'L', Firestone FS400

Dear Mr. Smith:

The following issue involves non-compliance to a sidewall stamping requirement. Bridgestone Firestone North American Tire, LLC ("BFNT") provides the following information in accordance with 49 C.F.R. Section 573:

1. The manufacturer of the motor vehicle equipment in issue is Bridgestone Firestone North American Tire, LLC ("BFNT").
2. The tires included in the noncompliance are Firestone brand 315/80R22.5 Load Range 'L' FS400, produced in the Warren County, Tennessee, plant during the DOT weeks of 24 and 25 in 2008.
3. BFNT estimates that 323 mismarked Firestone 315/80R22.5 Load Range 'L' tires have been produced. 40 of these tires are under our control, and 283 have been sold in the commercial truck tire replacement market in Canada and the United States. 99 of the sold tires have been recovered, with 184 units remaining in the field. These numbers will be amended to identify only those tires affecting the U.S. market as soon as possible.
4. The Firestone 315/80R22.5 Load Range 'L' FS400 tires produced in the Warren County plant were incorrectly marked; this incorrect marking is the noncompliance reported in this letter. The markings have been corrected for the next production run.
5. The noncompliance leading to this notification is a mismarking of the sidewall per FMVSS 571.119 S6.5 (e). The Max Speed marking is missing from both sidewalls.
The correct marking should be: MAX. SPEED 88 km/h (55mph).

6. This condition was discovered by one of our tire dealers upon inspection. BFNT will recover the tires from customers using internal sales records and through tire registrations. The affected tires will be replaced free of charge to the customer. Recovered tires will be collected at a central location and may be remedied through rebranding, with the casings offered for sale to retreaders. Replacement tires of the same size and type are readily available. The campaign will start September 19, 2008 and end on December 31, 2008. Customers who have been identified as potential customers of the affected tires will be sent a letter with instructions regarding inspection and replacement of tires subject to this recall. These tires are under warranty.
7. Copies of communication to customers and dealers are attached.
8. Notification to customers will begin on September 19, 2008 and end on December 31, 2008.

If you have any questions or require additional information, please contact me.

Sincerely,

Michael D. Kane
Vice President
Quality Assurance

cc: Mr. George Person
Office of Defects Investigation
Chief, Recall Analysis Division
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

BRIDGESTONE FIRESTONE NORTH AMERICAN TIRE, LLC

535 Marriott Drive
Nashville, Tennessee 37214-0990

September 19, 2008

SAFETY CAMPAIGN NOTICE

Dear Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Bridgestone Firestone North American Tire, LLC ("BFNT") has decided that 283 Firestone FS400 315/80R22.5 Load Range 'L' tires sold in the replacement market in the United States failed to conform to Federal Motor Vehicle Safety Standard (FMVSS) 571.119: "New Pneumatic Tires for Motor Vehicles with a GVWR of More Than 4,536 Kilograms (10,000 Pounds) and Motorcycles".

We found that a production run of this limited-production tire manufactured in 2008 at our Warren County, TN, plant did not conform to FMVSS 571.119. The 283 tires are missing the speed restriction of the tire which is "MAX. SPEED 88km/h (55MPH)". The *Firestone Medium & Light Truck Data Book* lists that the maximum speed of 55 MPH applies to this tire. If these tires are used at speeds above the 55 MPH maximum speed limit, there is a possibility that a tread/belt detachment may occur, leading to a loss of vehicle control. The described tire failure may create a risk of property damage, serious personal injury or death

You are receiving this letter because our records indicate that you have purchased tires that may be the subject of this safety campaign.

TIRE REPLACEMENT PROGRAM

As a part of its continuing commitment to safety and customer satisfaction, BFNT is conducting an important safety campaign to replace Firestone FS400 315/80R22.5 Load Range 'L' tires manufactured during the 24th and 25th weeks of 2008 at our Warren County, TN tire plant. No other production periods were affected. Authorized Firestone commercial truck tires dealer will replace the tires of the line and sizes covered by this campaign with new tires; and mount the replacement tires, *all at no charge or expense to you.*

DESCRIPTION OF TIRES COVERED AND HOW TO IDENTIFY THEM

If you have these tires, please examine your tires to see if they meet all of the following conditions:

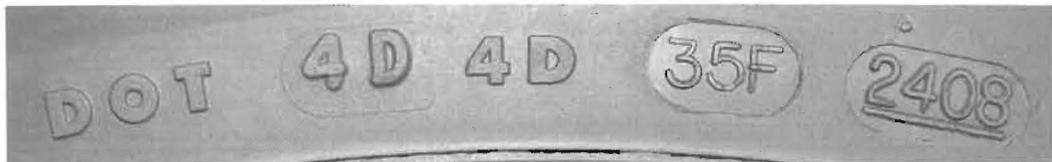
- (1) They are identified as "FS400"



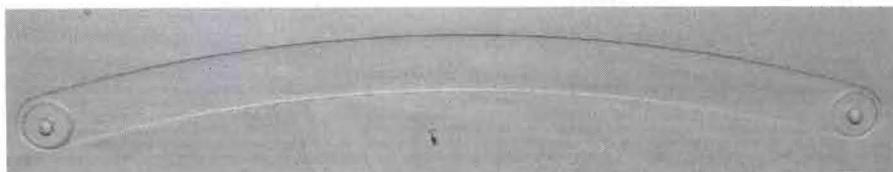
(2) The following size information is molded into the sidewall of the tire: 315/80R22.5
Load Range 'L'



(3) The tire's DOT Serial number is either "4D 4D 35F 2408" or "4D 4D 35F 2508".
The serial number can be found on the sidewall just above the rim.



(4) The affected tire lacks the appropriate MAX Speed marking on the sidewall (the affected tire is shown below):



If your tires meet all four of the above conditions, they are covered by this campaign.

(5) The correct marking is shown below:



HOW TO HAVE YOUR TIRES REPLACED

If you have any questions about whether your tires are covered by this safety campaign, contact any authorized Firestone commercial truck tire dealer. Please refer to the telephone yellow pages under "Tire Dealers" for commercial truck tire locations. In addition, you may use the web-based Firestone commercial truck tire dealer locator www.firestonetrucktires.com or call 1-800-815-9793 for assistance in locating a Firestone commercial truck tire dealer location that will assist in examining your tire.

If your tires are covered by this program, or if you need assistance in determining whether your tires are covered, contact any authorized Firestone commercial truck tire dealer to schedule an appointment. In the unlikely event that replacement tires are not available at the dealer you have contacted, tires will be ordered for you, and you will be notified when your replacement tires are in.

BFNT strongly recommends that you act as soon as possible to replace your tires if they are covered by this safety campaign. This campaign ends on December 31, 2008.

PROBLEMS OR CONCERNS

If you have any problems or concerns about this safety campaign, or if your authorized Bridgestone Firestone commercial truck tire dealer does not make the necessary replacements free of charge, please contact BFNT at 1-800-847-3272. You may also contact the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, SE West Building Washington, DC 20590.

CUSTOMERS MAY CONTACT THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION'S VEHICLE SAFETY HOTLINE AT 1-800-424-9393 OR 1-888-327-4236 (TTY: 1-800-424-9153); OR GO TO [HTTP://WWW.SAFERCAR.GOV](http://WWW.SAFERCAR.GOV).

We regret the inconvenience that this campaign may cause you, but we are certain you will understand our interest in your safety.

Very truly yours,
Bridgestone Firestone North American Tire, LLC

Bridgestone Firestone North American Tire, LLC

535 Marriott Dr.
P.O. Box 140990
Nashville, Tennessee 37214

September 19, 2008

To: BFNT Commercial Dealers

Subject: Firestone FS400 315/80R22.5 Load Range L (20 ply) Recall

Bridgestone Firestone North American Tire, LLC (BFNT) is initiating a recall of 283 Firestone FS400 315/80R22.5 Load Range L (20 ply) limited production tires that did not meet the sidewall stamping requirement of the Federal Motor Vehicle Safety Standard (FMVSS) No. 571.119: "New Pneumatic Tires for Motor Vehicles With a GVWR of More Than 4,536 Kilograms (10,000 Pounds) and Motorcycles". The 283 tires are missing the speed restriction stamping "MAX. SPEED 88km/h (55MPH)". The *Firestone Medium & Light Truck Data Book* lists that the maximum speed of 55 MPH applies to this tire. If these tires are used at speeds above the 55 MPH maximum speed limit, there is a possibility that a tread/belt detachment may occur, leading to a loss of vehicle control. The described tire failure may create a risk of property damage, serious personal injury or death.

Authorized BFNT Commercial Dealer locations will administer the tire inspection and, if necessary, tire replacement at no charge to the customer through December 31, 2008.

I. REASON FOR THE RECALL

BFNT has determined that 283 Firestone FS 400 315/80R22.5 Load Range L (20 ply) tires produced at the Warren County, TN plant did not meet the sidewall stamping requirement of the Federal Motor Vehicle Safety Standard (FMVSS) No. 571.119: "New Pneumatic Tires for Motor Vehicles With a GVWR of More Than 4,536 Kilograms (10,000 Pounds) and Motorcycles". The 283 tires, which were manufactured during 24th and 25th weeks of 2008, are missing the "MAX SPEED 88 km/h (55MPH)" stamping that is required to be on both sidewalls. The missing sidewall stamping was discovered by inspection and was corrected.

| <u>Description</u> | <u>Size</u> | <u>Art. No.</u> | <u>DOT Serial Numbers</u> |
|----------------------------------|-------------|-----------------|----------------------------|
| Firestone FS400 L.R. 'L' (20Ply) | 315/80R22.5 | 216-126 | 4D4D35F2408 4D4D35F2508 |

II. SERVICE ACTION REQUIRED BY BFNT COMMERCIAL DEALERS

- 1) If you have not already done so, verify your current NEW tire inventory. If you have tires that meet the above description and match the EXACT DOT serial numbers shown above but do not have the "MAX. SPEED 88km/h (55MPH)" stamping, please return the tires to your servicing BFNT distribution center. Contact the Commercial Customer Service Dept. and request that an RGA (Return Goods Authorization) be issued.

For your assistance in identifying a tire which is subject to this campaign, we have included photographs for clarification. Photograph #1 shows the DOT serial number of the recalled tire. Photograph #2 is an example of a recalled tire that is missing the sidewall stamping on both sidewalls. The third photograph shows the correct marking: i.e. the "MAX SPEED 88km/h (55MPH)" stamping which SHOULD appear on both sidewalls of tire. **Tires with the correct marking are not part of this campaign.**

FEDERAL LAW PROHIBITS THE REUSE OR RESALE OF RECALLED TIRES, AND VIOLATORS ARE SUBJECT TO FINES OF UP TO \$100,000 PER TIRE

- 2) Please check your sales records to determine if you may have sold any of the recalled tires. If you find that you have sold the affected tires, please provide BFNT with the customer contact information so they can be added to the recall mailing list.
- 3) Customers who are identified as potential purchasers of the affected tires will be issued a letter requesting that the owner check all tires fitting the above description in order to determine whether the tires are missing the "MAX. SPEED 88 km/h (55 MPH)" stamping. If so, the customer will also be instructed to examine the tires to identify whether they have the DOT serial number designations that exactly match one of the tires subject to this campaign. If the customer is unable to determine whether the tires are part of this campaign, the customer will be instructed to check the telephone yellow pages under "Tire Dealers" for commercial truck tire locations. In addition, the customer may use the web-based Firestone commercial truck tire dealer locator www.firestonetrucktires.com or call 1-800-815-9793 for assistance in locating a Firestone commercial truck tire dealer location that will assist in examining the tire.
- 4) Customers who visit an authorized Firestone commercial truck tire dealer location in connection with this campaign must have all tires inspected in order to determine whether the DOT serial numbers are an exact match as indicated above and that the stamping is missing. Please make sure to closely check each tire.
 - a. If the DOT serial numbers do not exactly match one of the 2 shown above, the tires are not a part of this recall.
 - b. Any tires with DOT serial numbers exactly matching one of the 2 shown above which are missing the required stamping are part of this recall and must be replaced immediately.
- 5) BFNT will replace recalled tires at no charge to the customer during the period beginning September 12, 2008 through December 31, 2008.

III. PROCEDURE FOR TIRES REMOVED FROM SERVICE

- All Firestone FS 400 315/80R22.5 Load Range L (20 ply) tires removed from service under this program **must be returned to the BFNT intact.**
- Tires which are subject to this campaign will be replaced at no charge to the customer through December 31, 2008.

- The tires will be processed as no charge tire adjustments. List the word “RECALL” as the reason for adjustment on the BFNT Limited Warranty Form.
- All normal tire warranty adjustment procedures used at dealer will also apply to any tires replaced under this recall.
- The customer may have received a postage paid *Tire Recall Notice Reply Card* in the customer letter from BFNT. If the customer has that card, please complete the card and mail it for the customer.

PHOTO #1: SAMPLE DOT SERIAL NUMBER – RECALLED TIRE

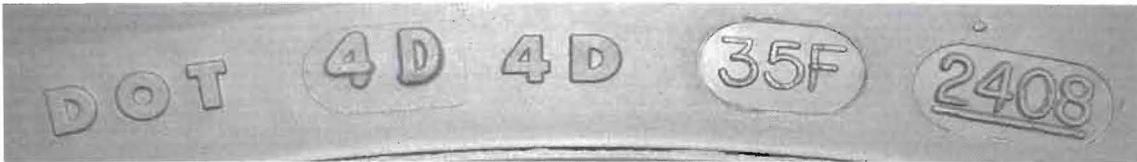


PHOTO #2: SAMPLE MISSING STAMPING – RECALLED TIRE BOTH SIDEWALLS

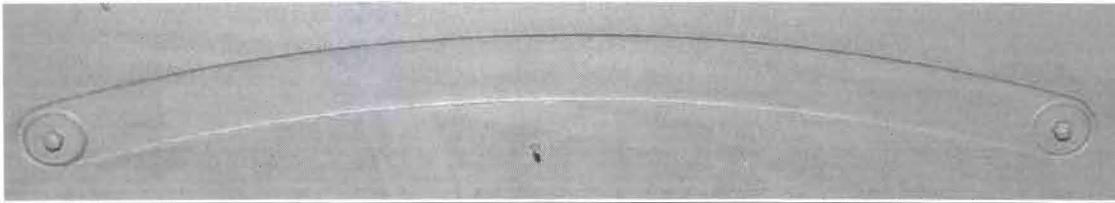


PHOTO #3: SAMPLE OF A PROPERLY STAMPED TIRE – BOTH SIDEWALLS



Thank you for your cooperation.

Very Truly Yours,


Singh Ahluwalia

President, Sales & Marketing
Bridgestone Bandag Tire Solutions