

RECEIVED
2008 DECEMBER 12
OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.



08T-029
(10 pages)

COOPER TIRE & RUBBER COMPANY
701 Lima Avenue • Findlay, OH 45840-2315

JACK JAY McCracken
ASSISTANT SECRETARY

Phone: 419.424.4333
Fax: 419.831.6893
EMail: jjmccracken@coopertire.com

December 11, 2008

**SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED 7160 3901 9842 8970 7748**

Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
1200 New Jersey Avenue, SE
West Building
Washington, D.C. 20590

Gentlemen:

Cooper Tire & Rubber Company has decided that a defect which relates to motor vehicle safety exists in one thousand six hundred ninety-two (1,692) tires as set forth in the attached Defect and Noncompliance Information Report dated December 4, 2008.

These tires are being voluntarily recalled.

A copy of this letter, with attachments, is being faxed to the Office of Defects Investigation (ODI) for review by ODI of the proposed owner notification letters pursuant to 49 CFR Section 573.6(c)(10). We are asking ODI to approve the sample owner letters. Hard copy will follow. Unless advised otherwise by ODI, owner notification will begin December 18, 2008. Three copies of the appropriate notification to dealers and customers are attached as exhibits in response to Item 9 of the Defect and Noncompliance Information Report.

Our envelope format for owner recall notification letters as required under 49 CFR 577.5(a) has been previously approved by ODI.

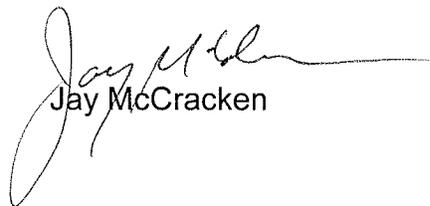
129,618

Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
December 11, 2008
Page 2

Cooper will provide the required quarterly report on the status of the above-mentioned campaign.

Please advise of the NHTSA assigned campaign number.

Very truly yours,



Jay McCracken

JJM/cls
Attachments

cc: Office of Defects Investigation "NSA-10"
Department of Transportation
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
1200 New Jersey Avenue, SE
West Building
Washington, D.C. 20590
Fax Number 202/366-1767
Attn: Mr. George Person
Recall Management Regulations

cc: R. V. Armes
J. E. Bodart
P. J. Brown
P. D. Caris
V. Castellaneta
M. C. Flannery
C. N. Gompf
W. R. Hansen
S. F. Jamieson
J. D. Kairys
J. E. Kline
T. N. Lause
H. C. Miller
J. E. Mitchell
C. R. Montalbine
C. P. Pantani
M. R. Riedel
S. O. Schroeder
J. J. Schumaker
J. D. Thomas
K. P. Thomas
P. G. Weaver
C. G. Yurkovich, Jr.

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: 12/04/08

NHTSA CAMPAIGN NO.

COOPER NO. 151

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

BRAND NAME

OWNER

Cooper CS4 Touring (VR)

Cooper Tire & Rubber Company

2. POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
215/55R17 Standard Load Tubeless radial tires	3D 3RCLT 3608 – 3D 3RCLT 4008 Sept. 7, 2008 – Oct. 11, 2008	1,692	100%

The recall population was based on our production records and inventory count reconciliations. The tires being recalled differ from similar items in that they were molded with a different DOT serial week and year in accordance with 49 CFR 574.5.

3. TOTAL UNITS POTENTIALLY AFFECTED: 1,692

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: 100%

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

5. **DESCRIPTION OF DEFECT OR NONCOMPLIANCE** (Including brief summary and detailed description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

The affected tires may have been cured for an inadequate amount of time. The condition became visually evident during routine inspection. In our visual inspection, shearography testing, and cut tire analysis, we have observed an undercure condition in selected tires produced during the subject serial weeks. The condition has been observed to be located in the tread stock on the shoulder area.

6. **CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT** (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

During routine visual inspection in production week 3908, our inspectors observed tires having blisters in the tread area. Upon continued investigation, it was determined that the condition was related to an undercured stock condition. Our inventory was then restricted from shipping additional tires until further investigation could be completed. Our analysis and bracket testing have been completed and determined that tires produced during DOT serial weeks 3608 – 4008 may contain the undercured stock condition.

Our inventory has been completely sorted for these tires. There was a total net cure of 3,272 tires of which we have accounted for 1,580 tires in our warehouses. There were 1,692 tires distributed. Cooper is voluntarily recalling these 1,692 tires.

7. **COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:**

The condition was determined by visual inspection, shearography testing, and confirmed by cut tire analysis.

8. **STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:**

Tires with the affected DOT serial week and year identification numbers should be shipped to one of our Regional Inspection Points. All tires returned to Cooper will be inspected for the correct DOT identification number and all tires found to have the affected DOT serial numbers will be scrapped.

The tires located in our inventory count reconciliation will also be scrapped.

9. **ENCLOSURES, IF ANY** (Three copies of all notices, bulletins and other communications that were sent to more than one distributor, dealer or purchaser and relate directly to the defect or noncompliance):



COOPER TIRE & RUBBER COMPANY
701 Lima Avenue • Findlay, OH 45840 • 419.423.1321

December 18, 2008

Dear Dealer:

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

Cooper Tire & Rubber Company has decided that a defect which relates to motor vehicle safety exists in all tires identified as follows:

Product	Size	DOTs	Brand
COOPER CS4 Touring (VR)	215/55R17	3D3RCLT3608 Thru 3D3RCLT4008	Cooper

Cooper Tire & Rubber Company has determined that the affected tires may have been cured for an inadequate amount of time. The condition became visually evident during routine inspection. In our visual inspection, shearography testing, and cut tire analysis, we have observed an undercure condition in selected tires produced during the subject serial weeks. The condition has been observed to be located in the tread stock on the shoulder area. In some cases the tread may separate from the tire casing resulting in body damage to the vehicle or in rare cases a driver may lose control resulting in a vehicle crash. Driving at highway speeds should be avoided until the tires have been inspected and replaced if they fall within the identification numbers shown above.

Cooper Tire & Rubber Company is recalling all of the tires with the identification number(s) above. Effective immediately, you or your dealers must not sell any of the tires listed and described above.

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions.

PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRES

NEW TIRES:

All recalled new tires existing in your inventory, or in your sub-dealers' inventories, should be returned immediately in one shipment, freight collect to the designated inspection point for your area as indicated on the attached map. To assure proper handling, these tires should be listed on the attached Returned Goods Form and the form must accompany this shipment in the packing slip envelope provided. This envelope must be listed on the bill of lading as: "1 envelope - related shipping documents." In order to expedite the sorting and crediting process, please use a crayon and write the words,

D1511208

"New Recall" on the sidewall of the tire.

Upon verification by Cooper Tire that the tires returned are within the recall group, we will issue credit to you based upon your last invoice price of the tires.

USED TIRES:

Cooper Tire's registration records are being searched and consumers who have purchased tires with the subject identification number(s) are being notified of the RECALL. Attached for your information is a copy of the notification being sent to such consumers. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

We have advised the consumer to return his recalled tire(s) and his letter to you. If your inspection verifies that the consumer has a tire(s) with the suspect identification number, the tire(s) should be replaced, mounted and balanced at no charge, if presented for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire(s) is available (if not available at the time of the inspection). It is expected that replacement tire(s) will be available at the time of inspection. However, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) days, tires will be replaced under our normal adjustment policy.

We have advised the consumer that it will take approximately thirty (30) minutes each to replace the recalled tires. For any tires removed from consumer vehicles during such sixty (60) day period, Cooper Tire will authorize an allowance of \$17.50 per tire to cover mounting and balancing.

"YOU ARE PROHIBITED BY FEDERAL LAW FROM SELLING NEW OR USED TIRES COVERED BY THIS NOTIFICATION."

Tires removed from consumer vehicles must be listed on our standard Tire and Tube Claim Form. The Claim Form must be properly completed and signed by the consumer and the consumer's copy of the recall letter attached. This claim form must accompany the shipment according to standard adjustment procedures.

For the purpose of the RECALL, the Claim Form must include RECALL tires only. The word "RECALL" must be printed directly below the name and address on the claim form. All tires should be identified in crayon with the Claim Form reference number per standard adjustment procedures. Also, please write the words, "Used Recall" on the sidewall of the tire.

Upon verification by Cooper Tire, credit will be issued to you on a no charge replacement basis if replaced by you and returned to Cooper on or before ninety (90) days after notice of this RECALL.

You should return in one shipment all recalled used tires to the inspection point as indicated on the attached map. These tires should be classified as SCRAP and shipped as SCRAP RUBBER TIRES, freight collect. Freight collect privileges apply only within the prescribed time period. Any tires returned after the designated time will be handled under our regular adjustment procedures.

Cooper Tire requests that you advise it of those customers of yours, if any, who have purchased any of the tires described above for which registration forms have not previously been submitted so that such customers can be advised of the recall and the replacement of their recalled tires can be scheduled.

We certainly apologize for any inconvenience this may cause you. If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact Cooper Tire Consumer Relations Department (800) 854-6288.

Sincerely,

A handwritten signature in black ink, reading "Vincent Castellaneta". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Vincent Castellaneta
Manager, Consumer Quality Systems

Attachments



COOPER TIRE & RUBBER COMPANY
701 Lima Avenue • Findlay, OH 45840 • 419.423.1321

December 18, 2008

Dear Customer:

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

Cooper Tire & Rubber Company has decided that a defect which relates to motor vehicle safety exists in all tires identified as follows:

Product	Size	DOTs	Brand
COOPER CS4 Touring (VR)	215/55R17	3D3RCLT3608 Thru 3D3RCLT4008	Cooper

Cooper Tire & Rubber Company has determined that the affected tires may have been cured for an inadequate amount of time. The condition became visually evident during routine inspection. In our visual inspection, shearography testing, and cut tire analysis, we have observed an undercure condition in selected tires produced during the subject serial weeks. The condition has been observed to be located in the tread stock on the shoulder area. In some cases the tread may separate from the tire casing resulting in body damage to the vehicle or in rare cases a driver may lose control resulting in a vehicle crash. Driving at highway speeds should be avoided until the tires have been inspected and replaced if they fall within the identification numbers shown above.

Cooper Tire & Rubber Company is recalling all of the tires with the identification number(s) above. To insure your safety and satisfaction with our product, we request that you return the recalled tires and this letter to your dealer. If the inspection verifies that you have a tire or tires with the suspect identification number, they will be replaced, mounted and balanced at no charge to you if you have presented them for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire is available (if not available at the time of inspection). It is expected that replacement tires will be available at the time of the inspection. However, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) day period, tires will be replaced under our normal adjustment policy.

The time required to determine if the tire is subject to recall is only a few minutes and approximately thirty (30) minutes per tire if replacement is required.

Should any questions or problems arise while your tires are being inspected or replaced, please call Consumer Relations at (800) 854-6288. We will attempt to be of service to you. In the event you believe we have failed to or are unable to replace your tire(s) without charge to you, within the sixty (60) day period described above, you may so notify the Secretary of

C1511208

Transportation at the following address: Administrator, National Highway Traffic Safety Administration, Washington, DC 20590, or phone NHTSA's Vehicle Safety Hotline at 888-327-4236 (TTY 800-424-9153; or go to <http://www.safercar.gov>).

We regret this inconvenience, but are sure that you understand our interest in your safety and satisfaction with your tires. Please see your dealer immediately for free replacement of the recalled tires. Give this letter to them so that it can be returned to us for purposes of this recall.

Sincerely,



Vincent Castellaneta
Manager, Consumer Quality Systems

TO BE COMPLETED BY DEALER

Tires inspected and replaced _____
(date)

Dealer stamp or name and address

Dealer: Please complete the above, attach letter to the Tire and Tube Claim Form and return with the recalled tires.