

[REDACTED]
Ojai, CA [REDACTED]
[REDACTED]
[REDACTED]

OCT 22 2012

October 15, 2012

US Department of Transportation
National Highway Traffic Safety Administration
Office of Defect Investigation (Room NVS-210)
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

Re: Tire deflation while driving on freeway due to apparently defective tire valve stem

To the Administrators:

Incident occurred 8/10/2012 on Highway 33 while I was driving north from Ventura, California toward Ojai. After I realized the tire was flat, I pulled off to the side of the freeway. Rear tire was badly split. I could not imagine how such damage could have occurred. AAA was called and replaced the tire with the spare. Subsequently, on visit to Big Brand Tire & Service, Ventura CA, for replacement of both rear tires, I was told that the splits were due to heat buildup due to driving on the tire before I pulled to the side and that the deflation was due to a cracked valve stem.

Other than some sort of defect in the stem, I do not know how the stem could have come to be cracked. For example, I know of no mishandling of the stem nor of the stem having been hit in any way.

The valve stem had been purchased and installed at the same Big Brand Tire store on 5/12/2009. I was told at that time that the manufacturer was Dill ACP but sample box from which valves came showed "ARGO TR 413". I have subsequently learned that Argo is a Chinese manufacturer that was exporting parts into this country at that time and that it is apparently entirely unrelated to Dill ACP. So the best information I have is that Argo and not Dill ACP is the manufacturer.

This is the second time that I have experienced a tire deflation due to an apparently defective valve stem. The first incident occurred in March of 2009 while the car was in the carport. It was reported to NHTSA (ODI ID #10264688) and was the reason for eventually obtaining an entire set of new valves at Big Brand.

Details are as follows:

- Two new BF Goodrich tires installed at Sears Auto Center 7/17/2007 along with valve stems
- Complete deflation of one of these tires, noticed while car parked in carport, 3/22/2009.
- Tire repaired at Tire Man, Oak View CA, 3/23/2009 and I was told at that time that cause of the deflation was a cracked valve stem.

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-The complete cracked stem was returned to me and shows Dill ACP as the manufacturer. It was among models that had been recalled, I learned.
-The remaining valve stems then were replaced at no charge to me by Sears Automotive Center, but the Sears invoice showed a different-sized stem than had actually been installed.
-For this reason and so as to have a good record I had all four stems replaced at Big Brand Tire & Service, Ventura CA as above mentioned.

-These four stems were installed at Big Brand on 5/12/2009. On asking the identity of the manufacturer at that time, I was told that it was "Dill" and then was shown a box as a sample of where the valves came from. The box was labeled "ARGO TR 413". I did not see "Dill" on the box but did not at the time see any significance in this.

-On 12/29/2009 the two tires purchased prior to the Goodrich tires were replaced by two new Pirelli tires at America's Tire, but the two BF Goodrich tires purchased at Sears remained on the car along with the valve stems replaced afterwards at Big Brand.

-It was one of these two BF Goodrich tires that deflated as I have described while driving on the Highway 33 freeway 8/10/2012.

-As mentioned, both tires were subsequently replaced at Big Brand, and I was told then that the cause of the damaged tire was the cracked valve stem.

-On leaving the store at the time, I asked that the this stem be returned to me. Part of it was then returned to me but only the outer part, with the result that it could not clearly be identified. I was told that the rest of it was too difficult to find.

-On inquiring at the corporate office of Big Brand Tire & Service (George Suarez, Camarillo CA), I was told that the manufacturer of the valve was probably Dill but that it could have been someone else. He said that they obtain their parts from a distributor, Myers Tire Supply Inc.

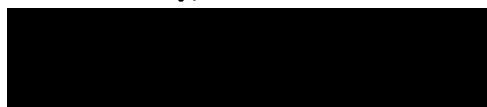
-On reviewing notes in my files on the first deflation incident, I was reminded of what I had been told about the valves coming from a box like that labeled "ARGO TR 413" but also told that the manufacturer was "Dill".

-I subsequently contacted Dill ACP at their headquarters in North Carolina and was told there by Mr. Schlesinger, engineering head I believe, that Argo is an entirely separate company from Dill, located in China, that was exporting parts into this country at the time. He said that for some reason complaints about the Argo valves are sometimes wrongly directed to Dill.

Enclosed are copies of two letters to Big Brand Tire & Service. They provide further details and show the difficulty in obtaining information and in having them look into the situation. A \$100 check without cover letter was received but there has been no response to the questions raised in my letters.

Also to note: I was told by Mr. Suarez at the Big Brand corporate office that issues such as I was raising were quite common, implying apparently that I was making too much of the situation. But if it's in fact all that common, that is actually all the more reason to look into the matter. I am hoping therefore that NHTSA will do that.

Sincerely,



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Enc: Letters to Big Brand Tire dated 8/29/2012 and 10/4/2012
Big Brand Tire Company invoice #185541, dated 5/12/2009

PS: Please confirm receipt of the letter, and if there are others who should be contacted or if more information is needed, please let me know.

* 4 new valve stems

So as to have proper record - since Sears invoice shows 2", but Sears mgr assured L:

INVOICE



Invoice No.: 185541 Page 1
 Order No.: 102220
 Date: 05/12/2009 Time: 11:18 AM
 Started by: 1716-JOHNNY SLONE
 Invoiced by: 1716-JOHNNY SLONE

VENTURA
 3850 E. MAIN ST
 VENTURA, CA 93003
 (805) 650-3290
 EPA #: CAL000079599 BAR #: ARD169683

Vehicle Information
 Year: 1999 Make: MAZDA
 Model: PROTEGE Color: GOLD
 License: [REDACTED] (CA) Odometer: 51,457
 Engine: 4-1597 1.6L DOHC
 VIN: JM1BJ2221X0 [REDACTED]

Cust.: [REDACTED] Cust. No.: 07-263865
 Address: [REDACTED] 6
 City, State, Zip: OJAI, CA [REDACTED]
 Home: [REDACTED] Work: [REDACTED] Cell: [REDACTED]

Customer Instructions Save Old Parts? No Bill To: Same

* All since replaced. (Hankook 8/14/2012 x 2
 when new tires purchased (Pirelli; 12/29/2009 x 2

Part No.	Description	Technician	Qty	Unit Price	Total Price
SHP VSC	VALVE STEMS - CHROME SLEEVED TR413		4.00	2.54	10.16
LBR LABT	INSTALL NEW VALVE STEM	JCA	4.00	7.25	29.00

Estimate Revisions

Invoice Summary

ver 03.03.2007

Prev Amt	Date	Time	Revised Amt	Auth By	Payment Type	Amount	Invoice Totals
40.00	05/12/2009	10:38 AM	40.00		MC	\$40.00	Parts 10.16 FET 0.00 Core Chg 0.00 Non Tax 29.00 Serv Agree 0.00 Waste Disposal 0.00 Shop Supplies 0.00 Sales Tax 0.84
							Total: 40.00

I acknowledge below and receipt of this invoice:

This estimate is based on our inspection at this time and does not cover additional parts or labor which may be required after the work has been started. After the work has started, worn or damaged parts which are not evident on first inspection may be discovered. This estimate cannot cover such contingencies. In cases where additional work is deemed necessary, customer authorization will be secured prior to commencement of that additional work. This estimate expires 15 days from date. I hereby authorize the repair work to be done along with the necessary material and hereby grant you and/or your employees permission to operate the vehicle herein described on streets, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above vehicle to secure the amount of repairs thereto. Dealer not responsible for unavailability of parts or delays in parts shipments beyond dealers control nor for loss or damage to vehicle or articles left in vehicle in case of fire, theft or any other cause beyond our control. Additional terms and conditions printed on reverse side. All parts installed are new unless specified otherwise. I acknowledge notice and oral approval of an increase in the original estimated price. XXXXX

Copy

[REDACTED]

Ojai, CA

[REDACTED]

August 29, 2012

Greg Robinson, President
Big Brand Tire & Service
805 Via Alondra
Camarillo, CA 93012

Re: Failure of tire valve stem purchased from Big Brand Tire Co. 5/12/09 (invoice #185541)

Dear Mr. Robinson:

The valve stem in question is one of four purchased at the time. The failure occurred while I was returning to Ojai from Ventura on the Highway 33 freeway, Friday 8/10/12. Driving on the deflated tire before I realized it was deflated caused serious damage to the tire so that two new ones needed to be purchased. They were purchased from Big Brand Tire in Ventura the following Tuesday, 8/14/12.

It was at the time of the purchase of these new tires that the cracked valve stem was pointed out to me by your employee, Stephen Williams, and I was told by him that the damage to the tire resulted from heat buildup due to driving on the deflated tire. That is, the cracked stem and not the badly damaged tire was the cause of the problem. This is very similar to a situation that occurred a number of years ago to me, although while the car was parked, that turned out to involve a valve stem purchased from Sears Automotive that had been recalled by the manufacturer.

Prior to leaving I asked that the damaged stem be returned to me. Mr. Williams then provided me with the just the outer part of the stem but not the inner part which would allow easy identification of the manufacturer, saying that it would be too difficult to find.

Yesterday I talked again with Mr. Williams at the Ventura shop. He fully recalled the situation and confirmed his original assessment.

Prior to this I had spoken to George Suarez in your office about the matter, pointing out that to all appearances the valve stem I had purchased was defective since I knew of no other reason why it should have failed, and I said that I wanted to know the name of the manufacturer so that the matter could be properly reported. Also, I asked that consideration be given to compensating me for the valve stem and damaged tire that necessitated purchase of the two new tires. The two BF Goodrich tires that were replaced, purchased at Sears Automotive 7/17/07, had about 50% of the warranted mileage left on them. This in my view, along with the valve stems themselves, is what I felt I should be compensated for. That would correspond to the actual loss to me. However, Mr. Suarez offered only compensation for one of the new tires installed, not including labor.

Greg Robinson, President
August 29, 2012
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More important than compensation, however, is the need to look into how the stem came to be defective. Here, Mr. Suarez failed to provide assurances that the matter was seriously looked into by your office. In particular I would point out the following:

-He spoke of the valve stem situation as being a quite common situation and to be expected since the part is made of rubber and rubber deteriorates over time. This is not a credible explanation. These parts obviously have to be much more reliable or there would be a serious and widespread safety situation created.

-Initially he told me that he could do nothing since he was not personally at the shop when I came in with the damaged tire. I asked that he contact Mr. Williams at the shop to verify the damage and diagnosis. This he refused to do. At a later time he said that the reason for this refusal was that I had not contacted him for 10 days and that Mr. Williams would not remember anything. This is not true. I contacted him in one week by my records, and as pointed out I just visited the shop yesterday and Mr. Williams fully recalled the situation.

-Unexpectedly, Mr. Suarez contacted me last Saturday morning inquiring about the damage part that had been returned to me. I told him that only a portion of the part had been returned. He then wanted to know if it was the inner or outer portion of the part. I told him that it was the outer part. He then told me that in that case the manufacturer could not be identified, that it was probably Dill but could be others. I asked him why then I had only been provided with the outer portion. He said this was because there is no way of removing the inner part from the tire. That explanation does not make sense. When I raised the issue with Mr. Williams at the time, the entirely different reason given me was that the parts were strewn all over the floor and so too difficult to find. Further, on a previous occasion at another shop there has been no difficulty in having the whole part returned to me. When your shop installed the four new valves in 2009 (not in connection with new tires) there of course would have been no difficulty in removing the old valves.

Finally, Mr. Suarez spoke of the possibility of there being causes other than a defect for the failure. I asked what he was referring to. He said the stems may have been "hit" or "mishandled" or that it may have been a matter of "age". But I have no knowledge whatever of the part being hit or mishandled, and there was no evidence of damage other than the cracking. As to "age" that would indicate the part was not new when purchased and so is scarcely a good reason.

Please see that the matter is properly looked into. Mr. Suarez's refusal to contact the shop and my not having been provided the intact part so that identification of the manufacturer and assessment of the damage are clearer are especially of concern to me. Please also let me know who the manufacturers may be other than Dill so the matter can be reported.

As to compensation due me, I am enclosing a copy of the invoice for the tires replaced to use together with your own invoices as documentation. If all you will pay is for the cost of one new tire, you have my address, but I would appreciate knowing what your reasoning is.

Sincerely,

copy

[Redacted]
Ojai, CA
[Redacted]

October 4, 2012

Greg Robinson, President
Big Brand Tire & Service
805 Via Alondra
Camarillo, CA 93012

Re: My letter to you of 8/29/2012 (copy enclosed) having to do with failure of valve stems purchased from Big Brand Tire, Ventura 5/12/2009 (invoice #185541)

Dear Mr. Robinson:

Your check for \$100 was received. That is appreciated but there has been no response to my letter, a copy of which is enclosed. Among other matters I asked in that letter for additional information as to the manufacturer of the apparently defective part sold to me in March of 2009. As mentioned, Mr. Suarez told me that the manufacturer was probably Dill but that it could have been others. He did not give me the names of these others and that was the reason for my request.

I do however have at least some information from notes I kept from the time of purchase. They indicate that I was told that the manufacturer was Dill and that I was then shown a sample box from which the valves came which was labeled "ARGO TR 413". Nothing I saw on the box said "Dill", but I did not at the time see any significance in this and assumed that, as told, Dill in fact was the manufacturer. On contacting Dill the other day, however, I am informed that ARGO is actually another manufacturer, located in China, that at least at that time was exporting products into this country and that is entirely unrelated to Dill.

This then is important information which you should know. Please therefore look into the matter. In particular I would be interested in knowing of any other information you might know as to the manufacturer and who the importer might be so that the National Traffic Highway Safety Administration can be properly informed. Also, I would like further assurance that the valves that accompanied my August purchase of two tires from Big Brand are in fact manufactured by Dill as I was again told.

Sincerely,

Ojai, CA



US DEPT. OF TRANSPORTATION
NHTSA
OFFICE OF DEFECT INVESTIGATION
(ROOM NYS-210)
1200 NEW JERSEY AVE. SE
WEST BUILDING
WASHINGTON, DC 20590

