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May 18, 2006

**BY HAND DELIVERY**

Mr. Richard P. Boyd, Chief  
Medium & Heavy Duty Vehicle Division  
Office of Defects Investigation  
U.S. Department of Transportation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

**Re: NHTSA Peer Information Request – NVS-214gtb (EA05-011)**

Dear Mr. Boyd:

Michelin North America, Inc. ("Michelin") has reviewed the peer information request that was received from your office in EA05-011. Michelin's responses are set forth below, after an italicized restatement of the Agency's original requests.

Michelin's response is being submitted with a request for confidential treatment of the responses to Requests #1 and #2 pursuant to 49 C.F.R. Part 512. The referenced attachments are contained on two compact disks. The confidential information responsive to Requests #1 and #2 is in Attachment A, which is enclosed on the first compact disk which has been marked: "Contains Confidential Business Information." A second non-confidential compact disk contains all of the remaining attachments, which are: Attachments B, C, D, E, F, G-1 through G-5, and H.

In accordance with 49 C.F.R. Part 512, two complete versions and a version containing only the portions for which no claim of confidential treatment has been made has been submitted with a copy of the confidentiality request to the Office of Chief Counsel.

**Performance Information Requests –**

1. *For each group of tires or family of tire sizes designed to be mounted to a 22.5" diameter rim (e.g. 275/70R22.5, 275/80R22.5, 12R22.5, etc.) that Michelin sold as original equipment to manufacturers of Class "A" motor homes since January, 2000 provide a summary that indicates:*

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*(a) The number of tires in the specified size or size ranges that Michelin sold each year since 2000;*

**Response**

See attached confidential Excel file – Attachment A.

*(b) the number of "failure reports" pertaining to "abrupt loss of air" (see earlier definition for complete description) for tires installed in the front vehicle position for each of the specified size or size ranges reported; and*

**Response**

See attached confidential Excel file – Attachment A.

*(c) the failure rate for each of the specified size or size ranges reported for tires installed in the front axle position of the vehicle.*

**Response**

See attached confidential Excel file – Attachment A.

2. *For each of the tire sizes or size ranges identified in response to Request No. 1, provide the equivalent or comparable information for tires sold as "Michelin Peer Components" (see earlier definition) i.e. original equipment manufactured and sold for applications other than Class "A" motor homes.*

*(a) The number of tires in the specified size or size ranges that Michelin sold each year since 2000;*

**Response**

See attached confidential Excel file – Attachment A.

*(b) the number of "failure reports" pertaining to "abrupt loss of air" (see earlier definition for complete description) for tires installed in the front vehicle position for each of the specified size or size ranges reported; and*

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**Response**

See attached confidential Excel file – Attachment A.

*(c) the failure rate for each of the specified size or size ranges reported for tires installed in the front axle position of the vehicle.*

**Response**

See attached confidential Excel file – Attachment A.

**Product Attribute Summary Comparison Request -**

3. *List and briefly describe the significant attributes, properties, characteristics and/or considerations that Michelin incorporates into tires sold, installed, and/or used in Class "A" motor home applications compared to equivalent-sized tires sold into other non-motor home applications (i.e. peer vehicles using the same size tires but engaged in service other than Class "A" motor home).*

**Response**

Michelin designs all commercial truck tires based on load carrying capacity, performance requirements, and knowledge of the conditions of use. Michelin's motor home design philosophy includes the following attributes, properties, characteristics and /or considerations that are appropriate and unique to tires used on motor homes:

- Variations and fluctuations in cargo carrying capacity and tire inflations due to dissimilarity of final assembly builds (including pre- and post- sale additions of equipment and accessories);
- Any inflation requirements provided by the motor home chassis or body builder
- Vehicle and tire storage conditions;
- Tire performance characteristics such as traction and tread wear; and
- Regulatory and industry standards.

Michelin's motor home tire design philosophy considers all the application-specific conditions listed above and incorporates material and design choices appropriate for the applications.

As with all tires designed and manufactured for use in the U.S., Michelin's tires for the Class "A" motor home application are in compliance with Federal Motor Vehicle Safety Standard 119 (49 CFR 571.119) for performance testing and markings. In addition, these tires are in

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conformity with the existing professional tire standards of the Tire and Rim Association, Inc. ("TRA") or the European Tyre and Rim Technical Organisation ("ETRTO") for highway service, loads and inflation pressures, tire sizing, interchangeability, and approved rims and valves.

4. *Describe Michelin's current policy and design guidelines provided to original equipment vehicle manufacturers of Class "A" motor homes regarding specifying / selecting front tires to assure that there is a "reserve capacity" or "safety margin" to safely accommodate circumstances when the front tire may be subjected to under-inflation and/or overload conditions.*

**Response**

The Class "A" motor home chassis and body builders almost always specify one tire size/tread design/ply rating for all wheel positions on the Class "A" motor home, and it is usually an all-position tire.

Class "A" motor home chassis and body builders are given printed or electronic pages of tire characteristic data to use to ensure the suitability of a given tire for application on a given model/configuration. They are also referred to the "michelintruck.com" web site as a source for off-hour information and/or current information. The Michelin Databook for truck tires – Attachment B (as well as the website) – describes the best application for its tires.

The specified tire is capable of carrying continuously the maximum load stated in the published literature at the maximum rated speed when inflated to the attendant recommended inflation pressure.

In addition, Michelin provides information regarding potential events which may compromise inflation pressure, such as leaking valve hardware, extremely long chassis/coach storage times, and the potential for vehicle delivery personnel to lower air pressure for better ride when the coach is empty.

Since the tires used on this market are usually "all-position" tires, Michelin makes no distinction between front and rear tire positions, other than the load and pressure recommendations associated with single or dual fitment.

Michelin makes available to Class "A" motor home chassis and body builders the following:

- Attachment B – Michelin Databook for truck tires;
- Attachment C – Michelin Warranty booklet for truck tires;
- Attachment D (pages 1, 2, 4 – 8, 10, and 13) – Michelin RV Tires Guide for Proper RV Tire Use and Maintenance

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- Attachment E (pages 3, 4, 6 – 8, 10, and 11) – Michelin Recreational Vehicle Tire Guide;
- Attachment F – Michelin Technical Bulletin Motorhome Weighing & Air Pressure Recommendation, where proper weighing of the vehicle is thoroughly addressed along with a discussion of the importance of determining and maintaining the proper tire inflation pressure; and
- Attachments G-1, G-2, G-3, G-4, and G-5 – Individual tire product description sheets (similar to that found in the Databook).

5. *Describe Michelin's current policy for providing recommendations and information to owners of Class "A" motor homes equipped with Michelin tires regarding*

*(a) how owners should determine and maintain the tire inflation pressure for the originally-installed front tires to assure that there is adequate "reserve capacity" or "safety margin" to safely accommodate the reasonably foreseeable range of circumstances in which the front tire may be subjected to under-inflation and/or overload conditions;*

**Response**

Michelin makes available to Class "A" motor home owners the following:

- Attachment B – Michelin Databook for truck tires;
- Attachment C – Michelin Warranty booklet for truck tires;
- Attachment D (pages 1, 2, 4 – 8, 10, and 13) – Michelin RV Tires Guide for Proper RV Tire Use and Maintenance
- Attachment E (pages 3, 4, 6 – 8, 10, and 11) – Michelin Recreational Vehicle Tire Guide;
- Attachment F – Michelin Technical Bulletin Motorhome Weighing & Air Pressure Recommendation, where proper weighing of the vehicle is thoroughly addressed along with a discussion of the importance of determining and maintaining the proper tire inflation pressure; and
- Attachments G-1, G-2, G-3, G-4, and G-5 – Individual tire product description sheets (similar to that found in the Databook).

In addition, Michelin attends various RV/motor home events each year to educate the owners. At these events Michelin presents information and recommendations regarding vehicle weight determination, proper tire inflation pressures, tire maintenance practices, and following their vehicle owner's manual.

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*(b) how owners should specify / select replacement front tires to assure that there is adequate "reserve capacity" or "safety margin" to safely accommodate reasonably foreseeable range of circumstances in which the front tire may be subjected to under-inflation and/or overload conditions;*

**Response**

See Part 5(a) and the referenced attachments and page numbers.

In addition, in the materials referenced above, owners are instructed to consult the vehicle certification label and the tire information label that are affixed to the vehicle for tire loading, inflation, and sizing requirements.

*(c) how owners should determine the appropriate front tire inflation pressure for the Michelin tires installed in their vehicle.*

**Response**

See Part 5(a) and the referenced attachments and page numbers.

In addition, in the materials referenced above, owners are instructed to consult the vehicle certification label and the tire information label that are affixed to the vehicle for tire loading, inflation, and sizing requirements.

6. *Describe Michelin's current policy and/or recommendations to original equipment vehicle manufacturers of Class "A" motor homes and/or vehicle owners regarding inspection and/or replacement of tires due to age.*

**Response**

Michelin states that it is impossible to predict when tires should be replaced based on their calendar age alone. However the older a tire the greater the chance that it will need to be replaced due to the service-related evolution or other conditions found upon inspection or detected during use.

Michelin makes available to Class "A" motor home chassis and body builders and owners the following:

- Michelin RV Tires Guide for Proper RV Tire Use and Maintenance"— Attachment D (pages 2 and 10);
- Michelin Recreational Vehicle Tire Guide — Attachment E (page 9 and 10); and

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- Michelin Technical Bulletin Service Life for RV/Motorhome Tires – Attachment H on the subject of tire service life for RV tires and the need for regular tire inspections.

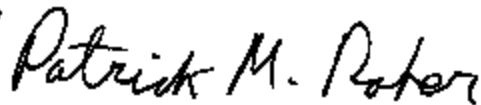
7. Describe Michelin's current policy and design guidelines for recommendations to original equipment vehicle manufacturers of Class "A" motor homes for specifying / selecting front tires based on speed rating.

Response

Michelin refers to its response to Request 4 above. Michelin cautions in the literature referenced in Request 4 that the speed rating is the maximum continuous speed that the tire may be subjected to when loaded to its maximum load rating and inflated to the recommended pressure for the load. "Continuous" is not precisely defined, but momentary excursions above this maximum speed for passing would not be exceeding the parameter. Users are always cautioned against exceeding lawful speed limits. It may be mechanically possible for the vehicle to exceed the maximum speed of the tire for long distances, as we see in the case of commercial trucks, but Michelin does not condone or approve of this use, e.g. Michelin truck tire "Databook" Attachment B page 22 footnote "... (\*) Exceeding the lawful speed limit is neither recommended nor endorsed ...", and "Michelin Recreational Vehicle Tire Guide" – Attachment E page 13 "...Exceeding the lawful speed limit is neither recommended nor endorsed ...."

Please don't hesitate to contact me or Latane Montague at (202) 637-6567 with any questions about this response.

Sincerely,



Patrick M. Raher

Enclosures: One Confidential Compact Disk  
One Non-confidential Compact Disk

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MAY 24 2006

Christopher H. Grigorian  
Arent Fox PLLC  
1050 Connecticut Ave., N.W.  
Washington, DC 20036-5339

Re: Confidentiality Determination/Toyo Tire (U.S.A.) Corporation – RQ05-001  
(Country Coach)

Dear Mr. Grigorian:

This is in response to your December 22, 2005 letter requesting confidential treatment for materials submitted by Toyo Tire (U.S.A.) Corporation (Toyo) and enclosed with your letter. The materials were provided voluntarily by Toyo to an agency representative during a field visit to a Toyo facility in connection with the above investigation. Specifically, you request permanent confidential treatment for 17 pages submitted.

Your letter and accompanying certificate indicate that the information provided is confidential and proprietary data that Toyo does not and has not released to the public.

I am granting your request.

The information provided by Toyo was not submitted in response to any formal agency request or other legal requirement. I have therefore determined that Toyo provided this information voluntarily. Accordingly, I have reviewed your request under the principles set forth in *Critical Mass Energy Project v. Nuclear Regulatory Comm'n*, 975 F.2d 871 (D.C. Cir. 1992).

Under the test set forth in *Critical Mass*, financial or commercial information provided to the government on a voluntary basis is "confidential" for purposes of FOIA Exemption 4 of the Freedom of Information Act if it is the kind of information that would customarily not be released to the public by the submitter. Your letter indicates that the documents contained in your submission reveal customer and owner identification information and internal business information that Toyo does not customarily release to the public. I am according confidential treatment to all of the information contained in the 17 pages submitted.

Subject to the following conditions, this grant of confidential treatment will remain in effect permanently. The information may be disclosed under 49 CFR § 512.22 based upon newly

discovered or changed facts, and you must inform the agency of any changed circumstances that may affect the protection of the information (49 CFR § 512.10). If necessary, you will be notified prior to the release of any information under the procedures established by our regulations (49 CFR § 512.22(b)).

Sincerely,

/s/

Otto G. Matheke, III  
Senior Attorney

NHTSA:NCC113:Matheke:pl:61834:05/24/06  
NCC-113:Subj/Chron NCC05-009630  
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