

The Goodyear Tire & Rubber Company
Akron, Ohio 44316 - 0001

November 1, 2006
(previously submitted on May 30, 2006)

Richard P. Boyd, Chief
Medium & Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 7th Street, SW.
Washington, DC 20590

Subject: Response to Request for Peer Information

Reference: EA05011

Pursuant to 49 U.S.C. Part 30166, The Goodyear Tire & Rubber Company hereby submits information requested in the recent letter we received regarding the referenced Engineering Analysis.

The confidential information, referenced in this response, is included on a compact disk marked "Confidential Business Information." The disk is being included with a request for confidentiality that is being submitted to the Office of Chief Counsel.

Two copies of the complete version of this response are being submitted to the Office of Chief Counsel with a request for confidentiality.

Sincerely,



Simeon S. Ford
Manager, Government and Customer Compliance
The Goodyear Tire & Rubber Company

Attachment

Performance Information –

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 Goodyear sold as original equipment to manufacturers of Class “A” motor homes since January, 2000 provide a summary that indicates:

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

*Response: see attached confidential Excel file – Attachment A – (tab 1-a)**

(b) the number of “failure reports” pertaining to “abrupt loss of air” for tires installed in the front vehicle position for each of the specified size or size ranges reported;

*Response: see attached confidential Excel file – Attachment A – (tab 1-b) **

(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:

We have not attempted to calculate a rate due to several limitations and/or qualifications pertaining to the information which could be used to determine the numerator as well as the denominator for any such rate:

(a) the request in 1(b) and 2(b) seeks "failure reports" for tires installed in the front vehicle position and the data we are able to provide contains information for both front vehicle position incidents as well as incidents where the position is not known;

(b) the potential numerator data set includes information pertaining to tires sold either as original equipment or replacement;

(c) the potential denominator data set [the sales data contained in response to 1(a) and 1(b)] contains information for tires in all positions, not just front positions;

(d) *see attached confidential Excel file – Attachment A – (tab 1-c) **

(e) *see attached confidential Excel file – Attachment A – (tab 1-c) **

(f) position and vehicle information is unavailable for adjustment (warranty) claims;

(g) *see attached confidential Excel file – Attachment A – (tab 1-c) **

(h) *see attached confidential Excel file – Attachment A – (tab 1-c) **

(i) *see attached confidential Excel file – Attachment A – (tab 1-c) **

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 “Goodyear 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 Goodyear sold each year since 2000;

*Response: see attached confidential Excel file – Attachment A – (tab 2-a) **

(b) the number of “failure reports” pertaining to “abrupt loss of air” for tires installed in the front vehicle position for each of the specified size or size ranges reported;

*Response: see attached confidential Excel file – Attachment A – (tab 2-b) **

(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:

We have not attempted to calculate a rate due to several limitations and/or qualifications pertaining to the information which could be used to determine the numerator as well as the denominator for any such rate:

(a) the request in 1(b) and 2(b) seeks “failure reports” for tires installed in the front vehicle position and the data we are able to provide contains information for both front vehicle position incidents as well as incidents where the position is not known;

(b) the potential numerator data set includes information pertaining to tires sold either as original equipment or replacement;

(c) the potential denominator data set [the sales data contained in response to 1(a) and 1(b)] contains information for tires in all positions, not just front positions;

(d) *see attached confidential Excel file – Attachment A – (tab 2-c) **

(e) *see attached confidential Excel file – Attachment A – (tab 2-c) **

(f) position and vehicle information is unavailable for adjustment (warranty) claims;

(g) *see attached confidential Excel file – Attachment A – (tab 2-c) **

(h) *see attached confidential Excel file – Attachment A – (tab 2-c) **

(i) *see attached confidential Excel file – Attachment A – (tab 2-c) **

Product Attribute Summary Comparison –

3. List and briefly describe the significant attributes, properties, characteristics and/or considerations that Goodyear 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: see attached confidential Excel file – Attachment A – (tab 3) **

4. Describe Goodyear’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: see attached confidential Excel file – Attachment A – (tab 4) **

Policies for Reserve Capacity, Aging, and Speed Ratings

5. Describe Goodyear’s current policy for providing recommendations and information to owners of Class “A” motor homes equipped with Goodyear 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” and/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: see attached confidential Excel file – Attachment A – (tab 5-a) **

(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 attached confidential Excel file – Attachment A – (tab 5-b) **

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

*Response: see attached confidential Excel file – Attachment A – (tab 5-c) **

Describe all policies that Goodyear has adopted prior to the current policy (described in response to the foregoing request) provided to vehicle manufacturers and/or owners of Class "A" recreational vehicle since January 2000 regarding recommendations intended to assure adequate tire "reserve capacity" and/or "safety margin."

Response: Not Applicable

Identify the time period(s) that each of the prior policies was applicable and the reason(s) that each of the prior policies had been changed.

Response: Not Applicable

6. Describe Goodyear'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: see attached confidential Excel file – Attachment A – (tab 6) **

Describe all policies that Goodyear has adopted prior to the current policy (described in response to the foregoing request) provided to vehicle manufacturers and/or owners of Class "A" recreational vehicle since January 2000 regarding recommendations regarding inspection and/or replacement of tires due to age.

Response: Not Applicable

Identify the time period(s) that each of the prior policies was applicable and the reason(s) that each of the prior policies had been changed.

Response: Not Applicable

7. Describe Goodyear'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: see attached confidential Excel file – Attachment A – (tab 7) **

Describe all policies that Goodyear has adopted prior to the current policy (described in response to the foregoing request) provided to vehicle manufacturers and/or owners of Class "A" recreational vehicle since January 2000 regarding recommendations for specifying / selecting front tires based on speed rating.

Response: Not Applicable

Identify the time period(s) that each of the prior policies was applicable and the reason(s) that each of the prior policies had been changed.

Response: Not Applicable

* CONFIDENTIAL INFORMATION - Submitted to Office of Chief Counsel