



HYUNDAI-KIA MOTORS

April 20, 2006

Mr. Jeffrey L. Quandt
Chief, Vehicle Control Division
Office of Defects Investigation
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

RE: NVS-213dlr, PE05-059

Dear Mr. Quandt:

This letter responds to your request regarding the above referenced issue.

The consumer complaints filed with NHTSA and Hyundai on this issue have essentially ceased. No new customer complaints have been made to Hyundai since Hyundai gathered information on January 6, 2006 in response to PE05-059. None of the NHTSA customer complaints were based upon tire valve damage that occurred after November, 2005. Hyundai has also reviewed customer contact files related to 2004 and 2005 model year Sonatas to determine if the subject condition has occurred on the 74,990 of those vehicles that are equipped with the same steel wheel and wheel cover as the 2002-2003 model year Sonata vehicles. No customer complaints have been made to NHTSA and only three customer complaints involving the 74,990 vehicles have been received by Hyundai concerning the tire valve damage condition. Two of those three owners reported the problem occurred after changing to BF Goodrich tires. The most recent of those reports was received in October, 2005.

Thus, whatever incompatibility problem existed with the BF Goodrich tire on the subject vehicle has been addressed. It is Hyundai's view that BF Goodrich recognized an incompatibility problem with the tire application and BF Goodrich and Uniroyal now do not recommend the use of their tires on the subject 2002 and 2003 model year Hyundai Sonata vehicles. In fact, both BF Goodrich and Uniroyal refer interested customers to Michelin, which recommends the use of the appropriate OE specification Michelin tire. Therefore, the source of the incompatible tires has already taken action to prevent selling them to Sonata owners. Since the misapplication problem is no longer occurring, there is no benefit to be gained by providing any additional information to vehicle owners.

Aside from the fact that the incompatibility is no longer occurring, there is the issue of whether this is a tire problem or a vehicle problem. The complaints filed with NHTSA clearly indicate it is a tire problem.

HYUNDAI-KIA MOTORS
Hyundai-Kia America Technical Center Inc.
6800 Geddes Road, Superior Township, MI 48196
TEL : 734-337-9499 FAX : 734-337-3168
www.hatci.com

APR 20 2006
10 09 AM
2100



HYUNDAI-KIA MOTORS

When Hyundai produced the 2002 and 2003 model year Sonata vehicles that are the subject of this investigation, the vehicles were equipped with 205/65R15 Michelin Energy MXV4 Plus tires. It is important to recognize that there has not been one reported instance of a wheel cover interference with that tire. That is, in the configuration produced by Hyundai, the Sonata has not had one single instance of the issue raised by NHTSA in the subject investigation.

At this time, many of the subject 73,306 vehicles and 74,990 model year 2004 and 2005 vehicles have had tires replaced. The replacement of tires would include many makes, brands, and models of tires. Yet, the tire in NHTSA's database that has clearly caused a problem is a BF Goodrich. If the problem was a Hyundai wheel cover design, many other makes, brands and models of tires would also be in NHTSA's consumer complaint database.

Moreover, information within NHTSA's complaint database further implicates the BF Goodrich tire. In ODI complaint 10123910, the consumer states that the vehicle was taken to a tire dealership and the consumer learned that the BF Goodrich tires have a bead protectant which causes the "hub caps" to rest directly against the tire, thus allowing the "hub cap" to move and cut the valve stem. This consumer notes that when a Goodyear tire was installed, there was no longer a problem.

In ODI complaint 10075193, the consumer reports a visit to the tire dealer, in which the dealer conferred with Goodrich, and Goodrich suggested the BF Goodrich tire not be used on the Sonata.

The fact that there are no tire/wheel cover problems with the original tires, the NHTSA consumer complaint database indicates a problem with the BF Goodrich tire, and the database indicates that characteristics of the BF Goodrich tire are the cause of wheel cover interference, clearly indicate the problem is the application of the BF Goodrich tire to the subject vehicles.

Hyundai respectfully believes that it should not be asked to issue an owner notification letter or an Owner's Manual update to address this matter as you requested. Hyundai believes that such a requirement to identify specific aftermarket equipment and inform owners that they should not install such equipment on their vehicles would establish a precedent that would be impossible to follow in a consistent and appropriate manner. This requirement directs responsibility for the use of unapproved aftermarket equipment to the vehicle manufacturer, who has no control over the choices made by vehicle owners. In the referenced matter, Hyundai believes that it is clear that there is no tire to wheel cover interference when original equipment tires are installed on the subject vehicles equipped with steel wheels and wheel covers and respectfully suggests that if NHTSA believes any action should be taken, it should be by BF Goodrich.

The data provided by Hyundai in its response of January 25, 2006 clearly illustrate that there is no unreasonable risk to safety related to this issue. At this time, there still have been no accidents or injuries related to the aftermarket tire installation on these vehicles. For the reasons provided in this

HYUNDAI-KIA MOTORS

Hyundai-Kia America Technical Center Inc.

6800 Geddes Road, Superior Township, MI 48198

TEL : 734-337-9499 FAX : 734-337-3188

www.hatcl.com



HYUNDAI-KIA MOTORS

letter, and for the reasons provided in Hyundai's response to PE05-059, and in consideration of NHTSA's conclusions in EA02-018, Hyundai believes that it should not be required to take action for a matter that is clearly not its responsibility.

Hyundai again requests that NHTSA close PE05-059 as no unreasonable risk to motor vehicle safety exists in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Robert Babcock".

Robert Babcock
Manager, Certification and Compliance Issues

HYUNDAI-KIA MOTORS
Hyundai-Kia America Technical Center Inc.
6800 Geddes Road, Superior Township, MI 48198
TEL : 734-337-9409 FAX : 734-337-3168
www.hakci.com