



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

DEC - 4 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mike Wischhusen
Michelin North America, Inc.
One Parkway South
Greenville, SC 29615

NVS-214gtb
DP09-006

Dear Mr. Wischhusen:

On November 30, 2009, the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) opened a Defect Petition (DP09-006) to investigate allegations that Blue Bird Campaign remedies administered under Campaign 07V-586 pertaining to certain 2005 – 2007 model year Blue Bird Wanderlodge Model M450 motor homes (marketed as “450 LXi”) manufactured from March 10, 2004, through September 27, 2006, were inadequate.

In their amended 07V-586 report, as one of the identified corrective actions, Blue Bird states that the defect(s) will be corrected in the following manner:

“.... Appropriate replacement tires will be provided and the front steering alignment will be checked and corrected, if necessary. New tire data labels will be supplied requiring 130 PSI tire inflation pressure.”

A portion of the owners’ allegations that the remedy is inadequate references the recommended 130 psi tire inflation pressure and whether that pressure is appropriate for a single Michelin 315/80R22.5 XZA2 mounted in the front steering position of these motor home vehicles.

ODI recognizes that ODI has previously discussed this issue with Michelin (in the context of this Campaign 07V-586 and the associated owner petition DP09-006) by phone. The purpose of this letter is to request confirmation and documentation of Michelin’s statements and observations so that this information is clear and unambiguous in ODI’s investigation files.



Owner-Petitioner Comments Regarding Tire Inflation Pressure -

Following are excerpts from comments that certain Blue Bird owners have provided NHTSA pertaining to inflating the Michelin XZA2 315/80R22.5 LRL tire (installed in the front position of the affected vehicles) to 130 psi as directed by one of the actions that Blue Bird prescribed in campaign 07V-586.

Source	Excerpt
Owner letter to NHTSA October 27, 2009 VOQ 10283828	"... I had my tires checked by a Michelin Tire dealer who said 130# air pressure was not a good idea on the front tires as the max [sic] on the tire was 130#s and said if I signed waiver he would put 130 pounds in them and recommended 122# which was put in them. The placard says 130 pounds..."
Owner letter to NHTSA November 4, 2009 VOQ 10292809	"... We have been told to carry 130 lbs. air in the front tires which is not what Michelin suggests..."
	"... Blue Bird stated the tires should have 130 psi, but Michelin stated is [sic] should be 120 psi. Michelin stated if 130 psi was [sic] put in each tire they would blow out easily..."

Based on the above, ODI is concerned about determining whether or not, at any time, Michelin may have changed their inflation recommendations from those published in various publications and/or whether inflating the Michelin XZA2 315/80R22.5 LRL to 130 psi can introduce risk that could threaten the integrity of the tire.

Information Requested -

In order for my staff to evaluate this issue, ODI is requesting that Michelin North America, Inc. provide certain information as requested below.

Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response.

After Michelin's response to each request, identify the source of the information and indicate the last date the information was gathered.

- (1) Identify and describe all changes and/or variations, whether or not published, in Michelin's recommendations regarding recommended inflation pressures for the Michelin XZA2 315/80R22.5 LRL (Load Range "L") tire.

- (2) Identify and describe all potential risks to the Michelin XZA2 315/80R22.5 LRL (Load Range "L") tire when inflated to 130 psi including, but not limited to increased susceptibility to "bruising," "blow-out" and/or other catastrophic or premature failure modes.
- (3) Provide any additional comments that Michelin feels may be useful to NHTSA's understanding and evaluation of this issue.

This letter is being sent to Michelin pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Michelin's failure to respond promptly and fully to this letter could subject Michelin to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(b), provides for civil penalties of up to \$5,000 per day, with a maximum of \$16,050,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. See 49 CFR 578.6 (as amended by 69 Fed. Reg. 57864 (Sep 28, 2004)). This includes failing to respond to ODI information requests.

If Michelin cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Michelin does not submit one or more requested documents or items of information in response to this information request, Michelin must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Michelin's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office **December 21, 2009**.

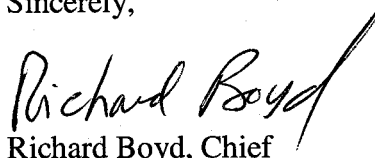
Please refer to **DP09-006** in Michelin's response to this letter. If Michelin finds that it is unable to provide all of the information requested within the time allotted, Michelin must request an extension from me at (202) 366-4933 no later than five business days before the response due date. If Michelin is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Michelin then has available, even if an extension has been granted.

If Michelin claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Michelin must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, to the Office of Chief Counsel (NCC-110), National Highway Traffic Safety Administration, **Room W41-227, 1200 New**

Jersey Avenue SE, Washington, D.C. 20590. Michelin is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.

If you have any technical questions concerning this matter, please call Mr. Tom Bowman of my staff, at (202) 366-2583.

Sincerely,

A handwritten signature in cursive script that reads "Richard Boyd". The signature is written in dark ink and is positioned above the printed name and title.

Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation