



Mr. Richard Boyd, Chief
Medium and Heavy Duty Vehicle Division
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

18 December 2009

By FEDEX and email

Reference: DP09-006

Dear Mr. Boyd:

Michelin North America, Inc. offers the following responses to the inquiries put forth in your letter dated 04 December 2009 with regard to the above mentioned action.

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

Response:

Michelin has not modified its recommendations for the recommended inflation pressure 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.”

Response:

Over inflation can cause an increase in road shocks and vibrations transmitted to the vehicle as well as an increase in tire failures from road hazards. Since 130 psi is the recommended inflation pressure for the maximum load capacity of the Michelin

Michelin

Industry Standards & Government Regulations
515 Michelin Road
Post Office Box 1987
Greenville, South Carolina 29602-1987



XZA2 315/80R22.5 LRL (Load Range "L") tire there should be no increased risk from operating at this pressure.

"(3) Provide any additional comments that Michelin feels may be useful to NHTSA's understanding and evaluation of this issue."

Response:

Michelin does permit a small over inflation on steer axle tires to alleviate the occurrence of free rolling wear. This is limited to 10 – 20 psi but never to exceed the maximum allowed inflation pressure for the wheel as stated by the wheel or rim manufacturer. Please see p36 of the 2009 Michelin Truck Tire Service Manual.

www.michelintruck.com/michelintruck/toolbox/reference-material.jsp

The Tire and Rim Association, Inc. also makes an allowance for over-inflation of tires when higher pressures are desirable to obtain improved operating performance. See page 3-04 of the 2009 Year Book of the Tire and Rim Association, Inc. If you need a copy of the Year Book of the Tire and Rim Association, Inc. you can contact the Association at:

THE TIRE AND RIM ASSOCIATION, Inc.
175 Montrose West Ave., Suite 150
Copley, Ohio 44321

www.us-tra.org

Sincerely,

Michael I. Wischhusen
Director, Industry Standards and Government Regulations
Michelin North America, Inc.

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