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DEFECTS INVESTIGATION

04T-023

3195

December 17, 2004

Kenneth N. Weinstein  
Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

**Re: Part 573 Defect Information Report**

Dear Mr. Weinstein;

Pursuant to the requirements of 49 C.F.R. Part 573, we are submitting the following report related to certain tires manufactured under Federal Motor Vehicle Safety Standards (FMVSS) No. 119 (New Pneumatic Tires for Vehicles Other Than Passenger Cars).

Pursuant to 49 C.F.R. § 573 Michelin North America, Inc. (MNA) reports the following:

573.6(c)(1) Name of Manufacturer:

Michelin Tyre Public Limited Company

573.6(c)(2)(iii) Items Potentially Containing the Defect:

Michelin XDE tires, size 10R22.5 LRG and LRF, that were periodically manufactured at the Ballymena, Northern Ireland plant during DOT weeks 21 through 43 in 2004 (beginning the week of May 23 and ending the week of October 24).

573.6(c)(3) Total Number of Tires Potentially Containing the Defect:

We believe that there are fewer than 4,000 potentially affected Subject Tires.

Michelin North America, Inc.

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

573.6 (c)(4) Percentage of Tires Estimated to Actually Contain the Defect:

We believe that up to 100% of the Subject Tires described above could contain the defect.

573.6(c)(5) Description of the Defect

A localized variance in the gauge of the inner liner, which could potentially result in a rapid loss of air pressure.

573.6(c)(6) Basis For Determination of Defect:

A routine quality check of a single Subject Tire in late October 2004 alerted the quality system to a potential issue. A detailed and thorough investigation was immediately undertaken, resulting in a decision to conduct this voluntary recall

MNA is unaware of any incidents of product failure in the field, or any injuries or property damage related to this condition in the Subject Tire. The Subject Tire is used in dual-tire, drive-axle applications.

573.6(c)(8) Remedy Program:

MNA will initiate a voluntary safety recall for all Subject Tires. The U.S. customers/consumers that may have purchased tires containing the condition described above will be contacted by first class mail beginning the week of December 27, 2004. This correspondence will explain the issue and include specific instructions as to how to obtain replacement tires without charge, as well as procedures for collecting reimbursement for remedies made prior to the recall, where appropriate.

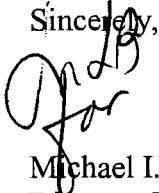
573.6(c)(9) Disposition of Recalled Tires

In accordance with the provisions of 49 CFR § 573.6(c)(9)(i-iii), MNA will make its dealers aware of the new dealer requirements that became effective in connection with the disposition of recalled tires, for the recall of the Subject Tires in a dealer notification that will be submitted to the agency separately pursuant to 49 CFR § 573.6(c)(10). The program for disposing of recalled tires returned to MNA will comply with applicable state and local law regarding the disposal of tires, and to the extent possible, will be channeled into a category of positive reuse or beneficial non-vehicular use.

573.6(c)(11) Owner Notification

A draft of MNA's owner notification letter is enclosed, for which we ask the Agency's prompt approval.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Wischhusen", is written over the word "Sincerely,".

Michael I. Wischhusen  
Director, Industry Standards &  
Government Regulations  
Michelin North America, Inc.  
Ph. 864-422-4220