

Continental

**TIRE**



Corporate

November 23, 2005

Ms. Kathleen C. DeMeter  
Director, Office of Defects Investigation  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Re: Noncompliance Information Report

Dear Ms. DeMeter:

Continental Tire North America, Inc., is re-submitting the corrected Noncompliance Information Report pursuant to 49 CFR Part 573.

If you have any questions, please do not hesitate to contact the undersigned at (704) 583-8694.

Sincerely,

**Donald Crawford**  
**Director, Quality Management**

Enclosure

**NONCOMPLIANCE INFORMATION REPORT  
CONTINENTAL TIRE NORTH AMERICA, INC.**

The information that is required by 49 CFR Part 573 follows:

**1. Manufacturer's name and address.**

The tires covered by this Report were manufactured by

Continental Tire de Mexico S.A. de C.V.  
Central Camionera, Zona Industrial  
San Luis Potosi, SLP,  
Mexico

which is represented in the United States for purposes of this Report by

Continental Tire North America Inc (CTNA),  
1800 Continental Blvd.  
Charlotte, NC 28273

CTNA also imported and distributed the tires and will be responsible for conducting the forthcoming recall campaign.

**2. Tires involved.**

The tires covered by this Report, which are described below, were produced in weeks 22 and 23 of 2005. The tire sizes and brand names are as follows:

LT275/70R18 125/122S Continental ContiTrac TR Load Range E  
Outline White Letter – DOT "P515 1V3W 2205" and "P515 1V3W 2305"

LT275/70R18 125/122S Continental ContiTrac TR Load Range E  
Black Sidewall – DOT "P515 1V3B 2205" and "P515 1V3B 2305"

LT245/70R17 114/110S General Grabber TR Load Range D  
Black Sidewall – DOT "P5P8 46LB 2205" and "P5P8 46LB 2305"

LT245/75R17 121/118S Continental ContiTrac Load Range E  
Black Sidewall – DOT "P543 1VUB 2205" and "P543 1VUB 2305"

Most of the subject tires were supplied for use as original equipment on a limited number of new trucks, manufactured by Ford Motor Company. The contact for Ford Motor Company is:

Ray Nevi, Assistant Director  
Automotive Safety Office  
Suite 500 330 Town Center Drive  
Dearborn, Michigan 48126

Some of the tires were sold as replacement tires.

### **3. Total Number of Tires Potentially Containing the Noncompliance.**

There are a total of 550 tires that are potentially non-compliant. However, those tires cannot be distinguished from other tires produced during that time period. The 550 potentially non-compliant tires are contained in a total volume of approximately 34,396 tires that were produced during the affected two weeks of production.

The various sizes and production volumes from the two week production of 34,396 tires are:

LT275/70R18 125/122S Continental ContiTrac TR OWL: 9,777 tires

LT275/70R18 125/122S Continental ContiTrac TR BSW: 7,171 tires

LT245/70R17 114/110 S General Grabber TR BSW: 6,393 tires

LT245/75R17 121/118S Continental ContiTrac BSW: 11,055 tires

### **4. Approximate Percentage of Tires Estimated to Contain the Noncompliance.**

A total of 550 tires, the equivalent of 1.6% of the potentially affected production volume, may contain the noncompliance.

In order to determine the tire sizes that potentially were affected, as well as the number of tires potentially containing the noncompliance, an analysis of steel cord production sequence and tire building was conducted in the manufacturing plant in Mexico. The traceability of these processes and cut tire section analysis of tires from inventory made it feasible to determine that only one skid of compound was non-specified. Therefore, only 1.6 % of the potentially affected production volume contains the noncompliance.

Also cut section analysis of tires from inventory enabled the determination of the specific period of production and the sizes in which the improper rubber compound was used.

### **5. Description of the Noncompliance.**

The skim rubber compound used in the belt component of these tires was not the specified rubber compound that was intended for use as detailed in the manufacturing specifications for the tires. The non-specified rubber does not have the necessary chemical adhesion properties to facilitate appropriate steelcord / rubber bonding.

Testing conducted by CTNA has shown that the affected tires do not comply with the endurance test requirements in FMVSS No. 119, "New pneumatic tires for vehicles other than passenger cars," which applied to these tires. In service the tires have demonstrated excessive vibration, bulging in the tread area, and uneven tread wear that will be noticeable to the driver.

To date, there have been no reported instances of any property damage or personal injury claims associated with this noncompliance.

## **6. Chronology of Events Leading to This Noncompliance Determination.**

On November 1, 2005, three LT275/70 R 18 ContiTrac TR tires were returned to the Continental Adjustment Center with complaints of vibration and irregular tread wear. Analysis by CTNA demonstrated a socketing condition of the belt wires in the top belt. Samples were taken from the belt skim compound for analysis. The analysis confirmed that a non-specified belt skim rubber compound had been applied in these returned tires.

Continental quarantined all potentially affected tires in its warehouses and distribution centers and informed Ford on November 3, 2005.

Over the next two weeks CTNA conducted an analysis as described under item 4.

On November 9, 2005, the 4<sup>th</sup> tire of the same size was returned to the Continental Adjustment Center, claimed with the same condition.

On November 14, 2005, several affected tires were tested to FMVSS 119 Endurance Standards. One tire failed the endurance standard and developed visible bulges in the tread area after 8 hours of testing.

On November 15, 2005, the 5<sup>th</sup> tire of the same size was returned to the Continental Adjustment Center, claimed as the others before.

On November 15, 2005, appropriate officials at CTNA decided that a noncompliance exists.

## **7. Description of the Manufacturer's Program for Remediating the Noncompliance.**

CTNA will conduct a notification and remedy (recall) campaign in cooperation with the original equipment manufacturer to replace tires installed as original equipment. CTNA will independently conduct a campaign to replace the subject tires that have been sold as replacement tires or are in dealer inventories. All known customers and dealers will receive notification of the campaign and

instructions on how to identify the subject tires. Dealers will be advised concerning suitable replacements for the tires.

CTNA will also reimburse customers who have replaced any of the noncompliant tires before the recall notice was received.

#### **8. Campaign Schedule and Draft Notices.**

CTNA expects to begin customer and dealer notification within 30 days. CTNA will submit draft customer notifications to NHTSA for review under separate cover.

#### **9. Plan for Disposition of Recalled Tires.**

Pursuant to 49 CFR 573.6 Continental will adhere to its Plan for the Disposition of the Recalled Tires.