Part 573 Safety Recall Report 22T-023

Manufacturer Name : Michelin North America, Inc.
Submission Date : AUG 06, 2024
NHTSA Recall No. : 22T-023
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Michelin North America, Inc.
Address : One Parkway South
Greenville SC 29615
Company phone : 864-422-4985

Population :

Number of potentially involved : 17,425
Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : Michelin
Tire Line : various
Tire Size : various
Descriptive Information : Replacement market tires for vintage vehicles. Subject tires are missing the DOT marking on the sidewalls. Michelin North America has not received any notification of safety or performance related issues regarding these tires from consumers.

Note:
On original 573 submission production date ranges are 1/1/2007 to 10/26/2022.

Amended 573 filing adding the 2 Pilot Sport sizes production date ranges are 01/02/2000 to 12/31/2022

Production Dates : JAN 02, 2000 - DEC 31, 2022

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
various	various	various	0100	5222

Description of Noncompliance :

Description of the Noncompliance :	The National Highway Traffic Safety Administration (NHTSA) requires that tire manufacturers comply with a tire marking system that helps ensure tire safety and performance on US roadways. When marked on the side of a tire, the letters "DOT" constitute a certification by the manufacturer that the tire meets all applicable Federal Motor Vehicle Safety Standards (FMVSS). A range of low-volume specialty tire lines designed for antique and vintage vehicles of European manufacture were inadvertently exported to the US without the requisite DOT marking and updated compliance testing to include FMVSS specific requirements. As a result, Michelin is voluntarily recalling 16,983 tires that have been sold into the US market. There have been no safety incidents related to the subject Michelin vintage tires reported in the US. As an amendment to the original filing, Michelin recently determined that two additional vintage Pilot Sport sizes were inadvertently exported to the US without the requisite DOT marking and the list of tire sizes affected by this recall has been updated to include 452 additional tires, bringing the total number of affected tires to 17,435. There have been no safety incidents related to any of the subject tires reported in the US.
FMVSS 1 :	109 - New pneumatic and certain specialty tires
FMVSS 2 :	139 - New pneumatic radial tires for light vehicles
Description of the Safety Risk :	Without the DOT symbol on the sidewall, the tire contains no declaration to its certification. Additionally tires with a missing DOT marking could be used in inappropriate applications.
Description of the Cause :	Michelin produces a specialty collection of low-volume vintage tires for European antique and vintage vehicles. As Michelin became aware of a small, but interesting market for these tires in the United States, the decision was made to begin sales of these tires to a single distributor in the US. In October 2022, Michelin began to implement a plan to update the supply chain for these tires and detected the potential that certain tires were sold into the United States without the requisite DOT marking and updated compliance testing to include FMVSS specific requirements. This marking noncompliance was subsequently confirmed to be due to a supply chain routing error. In the case of the 2 Pilot Sport sizes amended to this filing, all required FMVSS 139 testing was completed and the tires qualified for export to the US, but a procedural error made during the tire design validation process resulted in the mold engraving drawings for these tires being issued without letters "DOT" present on the sidewall plates.

Identification of Any Warning that can Occur :	Not applicable

Involved Components :

Component Name :	tires
Component Description :	NR
Component Part Number :	NR

Supplier Identification :

Component Manufacturer

Name :	NR
Address :	NR
	NR
Country :	NR

Chronology :

Original filing chronology:
Michelin North America became aware of a potential marking issue with vintage automobile tires on 13 October 2022. During this initial meeting, it was learned that some vintage automobile tires without DOT markings had been shipped to the US and sold. Shipments of known non-compliant tires to the US distributor were stopped on 26 October 2022. Between 13 October and 28 November, Michelin North America worked with Michelin's team in Clermont-Ferrand France to determine the tire lines, dimensions, and volumes of the affected tires. A determination meeting was conducted by Michelin North America on 1 December 2022 to proceed with a recall of the affected tires.

Chronology for amended Pilot Sport sizes:
July 20, 2023 An audit of physical inventory reveals that two sizes of the vintage Pilot Sport line were missing letters DOT on the sidewall. North American exports were blocked and inventory still under Michelin control was blocked and quarantined.

July 26, 2023 Counter-verification of design and production records demonstrated that the non-compliance was due to a transcription error that occurred during creation of mold specifications, resulting in failure to include a call-out for letters DOT on the sidewall plates. These sizes were fully tested to FMVSS 139 requirements, and were validated for US export in Michelin's supply chain systems, which led to non-detection of the Pilot Sport sizes during the initial vintage tire analysis associated with recall 22T023.

July 28, 2023 Analysis of production and export history completed.
August 17, 2023 Michelin North America worked with Michelin's team in Clermont-Ferrand, France completed confirmation of DOT certification status of the affected tires.

August 30, 2023 Decision to amend and submit 73 documentation for vintage tire line recall 22T023 was uploaded to the NHTSA portal.

Description of Remedy :

Description of Remedy Program :

Original filing:
Due to low production volumes of the specialty tires involved in this recall, Michelin will be conducting a phased recall of the subject tires over approximately the next 13 months. Michelin and the distributor of the subject tires has located the purchase and/or registration records for approximately 7,760 of the 16,983 of tires involved in this recall because the production dates for the subject tires range from January 2007 through October 2022. As noted in 49 CFR §574.7, tire registration records must be maintained for not less than five years from the date when purchase information is recorded; therefore, the purchase or registration records for many of the subject tires are no longer available.

Based on Michelin production and logistics schedules as of late March 2023, Michelin anticipates that remedy tires will be available as noted in the following list.

Month / Year	Number of SKUs	Number of Tires
May 2023	10	2,786
July 2023	8	3,245
August 2023	2	450
October 2023	4	346
November 2023	2	75
December 2023	12	607
January 2024	1	28
February 2024	2	57
April 2024	1	43
To be determined	9	122

Owners of the subject tires will be notified via a second owner notification letter when their specific SKU of remedy tires are available for ordering. This letter will also include detailed instructions on how to arrange for replacement tires to be shipped to the owner or the owner's specified dealer or restoration shop at no cost to the tire owner. Michelin will provide a cash value debit card to the owners of the subject tires to defray the cost of mounting and balancing the remedy tires.

Amended filing to include 2 Pilot Tire sizes: Affected tires will be replaced with compliant product.
Amended filing to include a full refund option if replacement tires are not available.

How Remedy Component Differs

Remedy tires will bear the DOT marking on both sidewalls as specified in

from Recalled Component :	the FMVSS and will be tested confirming compliance with all applicable FMVSS regulations.
Identify How/When Recall Condition was Corrected in Production :	Correction of production in original filing: All shipments of noncompliant tires to the US have been stopped and the distributor has been informed that sales of the affected tires must be stopped. Correction of Pilot Sport production added to amended filing: These tires were not in active production at the time the non-compliance was detected. Production molds will be re-engraved to include the letters "DOT" on both sidewalls ahead of the next production start.

Recall Schedule :

Description of Recall Schedule :	The recall notifications schedule for the original filing was approved by NHTSA as a separate document (loaded in the recall portal). Planned notifications to dealer and owners is shown to the right in form during original 573 submission. The amended Pilot Sport tires are part of the same vintage tire collection and can be integrated into the remedy process approved for the original vintage tire recall population. Planned notification for dealer and owners for amendment 573 submission for 2 Pilot Sport sizes provided below: Planned notification dates for amended Pilot Sport sizes: Planned Dealer Notification Begin Date: September 1, 2023 Planned Dealer Notification End Date: September 8, 2023 Planned Owner Notification Begin Date: October 23, 2023 Planned Owner Notification End Date: October 30, 2023
Planned Dealer Notification Date :	DEC 08, 2022 - DEC 08, 2022
Planned Owner Notification Date :	MAR 28, 2023 - APR 15, 2024

Purchaser Information :

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name :	NR
Address :	NR
	NR
Country :	NR
Company Phone :	NR

* NR - Not Reported