

NONCOMPLIANCE INFORMATION REPORT

On July 23, 2022, P.T. Elangperdana Tyre Industry ("EP") has received a letter dated June 22, 2022 from National Highway Traffic Administration ("NHTSA") stating that the Office of Vehicle Safety Compliance ("OVSC") tested the Zeetex AT 1000 tire, size LT245/75R17 manufactured by EP (the "Subject Tire") for compliance with the Federal Motor Vehicle Safety Standards ("FMVSS") specifically as set forth in 49 C.F.R. Sec. 571.139, New pneumatic radial tires for light vehicles. The testing was performed in June at Smithers in Ravenna, Ohio. A sidewall separation near the bead area was identified during the post-test visual inspection. The letter further states this constitutes a possible non-compliance with FMVSS No. 139 Section S6.3.2(a).

EP is submitting this report pursuant to provisions of 49 CFR 573.

EP conducts, as a part of its routine quality assurance program, following the initial product testing at design and product launch testing, periodic indoor internal surveillance tests of finished products. Throughout these tests, all of its products must fully satisfy standards set forth in 49 CFR §571.139 of Federal Motor Vehicle Safety Standards ("FMVSS") as well as internally established performance criteria which are on purpose set higher than those of FMVSS. EP regards failure to fully satisfy both FMVSS and internally established performance criteria as a defect.

The result of this defect could be premature ending of tire service life under extreme conditions of use or abuse of tires. To this date, however, no returns, complaints, or claims have been presented suggesting or relating to this defect.

The information required by the applicable regulations follow:

1. Manufacturer's Information.

The full corporate name of the fabrication manufacturer/brand name/trademark owner of the tires at issue in this report. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 USC §30164:

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27 Dillingham Place
Englewood Cliffs, NJ 07632

Telephone No.: (201)894-8080
Email address: dkmin@dkminlaw.com

2. Tires Involved in this Notification.

The tires involved are sold in the replacement market. The involved tires are as follows;

Generic Name of Item: LT Tires.

Manufacturing Plant: Plant of P.T. Elangperdana Tyre Industry (Plant Code : 109)

Brand: Zeetex

Model: AT 1000

Size: LT245/75R17/10 121/118R AT 1000

Additional Sizes added; LT 235/80 R17/10 120/117R AT1000 (ID) TL(T)

LT 275/70 R18/10 125/122S AT1000 (ID) TL(T)

LT 285/75 R16/10 126/123R AT1000 (ID) TL(T)

LT 275/65 R20/10 126/123S AT1000 (ID) TL(T)

LT 245/75 R17/10 121/118R AT1000 (ID) TL(T)

Function: LT Tires.

Other information which characterizes/distinguishes the items of equipment to be recalled;

DOT Number (Plant Code: 109)

Years	DOT Numbers	Quantity
2017-2018	09 B5 50	1849
2019-2022	109 1B51 50	4526
For Years of 2022 until Serial Code 2322.		

3. Total Number of Tires Potentially Containing the Defect.

6375 tires potentially contain the defect which represents the entire population.

4. Approximate Percentage of Tires Estimated to actually contain the defect.

Assumed to be the whole population.

5. Description of the Defect.

Less than expected sidewall (bead) performance under extreme conditions of use or abuse of tire.

6. Chronology of Events Leading to this Defect Determination.

6/22/2022: Received a letter from NHTSA regarding possible non-compliance with FMVSS No. 139 Section S.6.3.2(a)

6/ 23 /2022 until 7/07/2022: Investigation to confirm existence of endurance test results performed at product initiation and from surveillance tests, determine extent of the issue and identification of the cause of the difference was conducted.

7/ 8 /2022: We have done our initial and periodically surveillance test accordance our internally schedule and the result no noncompliance was found

7/22/2022: Nevertheless it is E.P.'s judgement to respect NHTSA's compliance test result. E.P. immediately stopped production of the subject tire and is undertaking complete review of the design and manufacturing process and various internal compliance test procedures and test pass/fail criteria. Upon added assurance that the subject tire complies in every respect with requirements of FMVSS No. 139 Sec. S.6.3.2(a), E.P. will resume production of the subject tire. For this process, E.P. will seek service of an outside test facility yet to be determined.

7. Description of Proposed Remedy.

E.P. plans to remedy the defect by monetary compensation calculated by multiplying the cost of the tire times the remaining tread depth over the mileage warranty.

8. Campaign Schedule and Draft Notices.

E.P. plans to conduct the recall campaign by following the schedule below:

Once compilation of a list of individual customers who purchased the affected tires is completed, notice to distributors, dealers, and owners will be sent by certified mail or by regular mail as appropriate within five (5) business days following receipt of a written

acknowledgement and approval from the National Highway Traffic Safety Administration.

This Notice will offer a monetary compensation as set forth above. All returned tires will be destroyed by mutilation

9. Representative Copies of Notifications that Relate to the Defect and plans to be Sent to Dealer or Purchaser are attached hereto for NHTSA's review and approval.

10. EP's Plan for Apprising Entities Collecting the Recalled Tires of Their Legal Obligations with Regard to Destruction and Disposal of Noncompliant Tires and Plan for Limiting Disposal of Recall Tires in Landfills.

EP's notice of recall to distributors/dealers will mandate customers and dealers to label each and every recalled tire with a tag provided by EP and to ship to Zafco International LLC located at before paying compensation for the returned tire.

11. EP with Zafco International has maintained a list of the names and addresses of the first purchasers of the recalled tires. EP will send a recall notice to each and every owner of the recalled tires registered.

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If you have any questions, please contact Dae-Ki Min, Esq., EP's legal representative at (201)894-8080 or Fathul Mubaroq, Quality Assurance Manager of EP at fathul@eptyres.com.