Part 573 Safety Recall Report 25T-001

Manufacturer Name : Pirelli Tire, LLC
Submission Date : FEB 21, 2025
NHTSA Recall No. : 25T-001
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Pirelli Tire, LLC
Address : 100 Pirelli Drive
P.O. Box 700 Rome GA 30161
Company phone : 706-368-5800

Population :

Number of potentially involved : 2,023
Estimated percentage with defect : 100 %

Tire Information :

Tire Brand 1 : Pirelli
Tire Line : P7 Cinturato
Tire Size : 245/45R18 100 Y
Descriptive Information : 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT radial tires, original equipment and replacement. The original equipment tires were installed on certain Mercedes-Benz E-Class passenger cars imported into the U.S. by Daimler (422 tires installed on 211 vehicles). The replacement tires were imported into the U.S. by Pirelli Tire LLC (1,601 tires, based upon a review of distribution records, net of re-exported tires).
Production Dates : APR 03, 2017 - FEB 15, 2019

TIN (Tire Identification Number)

Plant ID	Size code	Optional Code	Begin M Code	End M Code
93	4J	T791	1417	0619

Description of Noncompliance :

Description of the Noncompliance : The subject tires were marked as having a maximum permissible inflation pressure of 340 kPa, although the tires were designed and engineered as having a maximum inflation pressure of 350 kPa for which the tires comply with regulatory requirements. Accordingly, these tires do not comply with FMVSS 139, S5.5(c), which requires that the tires be marked with the maximum permissible inflation pressure for this tire. As a consequence of this unintended reduction of the labeled maximum inflation pressure, the tires fall subject to a different strength test prescription under FMVSS 109/139, which these tires were not meant to satisfy. The tires meet all applicable minimum performance requirements and other labeling requirements for tires with a maximum permissible inflation pressure of 350 kPa.

FMVSS 1 : 139 - New pneumatic radial tires for light vehicles

FMVSS 2 :	NR
Description of the Safety Risk :	If the tire is exposed to a deformation comparable to the test conditions applicable to the tire as erroneously labeled, the tire may experience a breakage at a breaking energy level lower than specified in the standard FMVSS 109/139. If, under the above circumstances, the tire structure is compromised and a sudden loss of air occurs, there may be an increased risk of a vehicle crash.
Description of the Cause :	The subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked accordingly.
Identification of Any Warning that can Occur :	In the event of a breakage of the tire structure, the operator may feel vibration or shuddering. However, these are run-flat tires and, therefore, they are designed to provide stability and control in the event of air loss.

Involved Components :

Component Name :	Sidewall marking
Component Description :	Sidewall Marking
Component Part Number :	NR

Supplier Identification :

Component Manufacturer

Name :	Not applicable
Address :	NR
	NR
Country :	NR

Chronology :

Feb. 7, 2019: Pirelli Tire LLC was advised by Pirelli Deutschland GMBH that it was investigating an informal report from an OEM customer, Daimler, that the Korea Automobile Testing & Research Institute (KATRI) allegedly tested the subject tire, 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT tire (fitted onto a Daimler vehicle) and that the tire reportedly did not meet the plunger test specification under KSM 6750 applicable to this tire as labeled.

Feb. 7 - 14, 2019: Pirelli Deutschland GMBH continued to investigate the matter, including review of production

and shipping records in preparation for discussion with KATRI representatives.

Feb. 14, 2019: Representatives from Pirelli Deutschland GMBH and Daimler met with KATRI in Korea to discuss KATRI's test methodology.

Feb. 15, 2019: Pirelli's investigation concluded that the subject tires were erroneously marked with a maximum permissible inflation pressure of 340 kPa, although the tires were engineered to withstand a higher maximum inflation pressure of 350 kPa and should have been marked accordingly. Based upon the results of this investigation, Pirelli management determined that the labeling error had the effect of rendering the subject tires partially noncompliant with FMVSS 139. The tires meet all applicable performance standards and other labeling requirements for tires with a maximum permissible inflation pressure of 350 kPa.

March 18, 2019: Pirelli submitted a petition for inconsequential noncompliance under 49 U.S.C. §§ 30118(d) and 30120(h).

Dec. 7, 2022: Pirelli received the agency's denial of the petition.

Dec. 20, 2022: Pirelli submitted an appeal of NHTSA's denial.

Jan. 10, 2025: Pirelli received a letter advising of NHTSA's denial of the appeal and directing Pirelli to file a new Part 573 noncompliance report within five (5) working days.

Pirelli is not aware of any failures, accidents or injuries related to this labeling error.

Description of Remedy :

Description of Remedy Program :	• Pirelli will work with Mercedes-Benz to identify and notify any owners of vehicles equipped with the subject tires as original equipment. • Letters will be sent to each distributor or dealer that purchased the recalled tires for the replacement market, directing them to check their inventory to determine if they have any affected tires. • Pirelli will notify all customers for whom we have registration information and provide instructions for having the remedy performed. • All tires with a TIN reflecting production during the affected period will be exchanged at no cost to the customer (including labor for mounting and balancing). • All recalled tires will be rendered inoperable by the dealer and returned to the Pirelli Warranty Center for proper disposition. • This program to provide remedy tires without charge to the owner will be conducted through October 31, 2025. • As this recall relates to a labeling error, Pirelli will not be offering reimbursement (as permitted by 49 CFR 573.13(m)).
How Remedy Component Differs from Recalled Component :	The recalled tires will be replaced with 245/45R18 100 Y Cinturato P7 (*) (RSC) (MOE) RUN FLAT radial tires, which are marked with a maximum inflation pressure of 350 kPa.

Identify How/When Recall Condition was Corrected in Production :	Pirelli has ceased production of the affected tire. Production of replacement tires labeled with the maximum permissible inflation pressure of 350 kPa commenced on or about calendar week 12, 2019.

Recall Schedule :

Description of Recall Schedule :	Pirelli intends to conduct owner and dealer notification on or before the dates indicated.
Planned Dealer Notification Date :	MAR 10, 2025 - MAR 10, 2025
Planned Owner Notification Date :	MAR 17, 2025 - MAR 17, 2025

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 :	Mercedes-Benz USA, LLC
Address :	13470 International Parkway HPC171 Jacksonville, FL FL 32218
Country :	US
Company Phone :	9047419606

* NR - Not Reported