



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Administrator

400 Seventh St., S.W.
Washington, D.C. 20590

SEP 6 2000

The Honorable John D. Dingell
Ranking Member, Committee on Commerce
House of Representatives
Washington, D.C. 20515-6115

Dear Congressman Dingell:

Thank you for your letter concerning a safety defect in certain tires manufactured by Bridgestone/Firestone, Inc. (Firestone). After becoming aware of a significant number of complaints about these tires, the National Highway Traffic Safety Administration (NHTSA) opened a defect investigation on May 2, 2000. As a result of this investigation, on August 9, 2000, Firestone announced that it would recall 14.4 million of these tires to remedy a safety-related defect. Our investigation is ongoing and incomplete at this time. However, we have made a diligent effort to answer your questions as completely as possible at this time.

1. Has the National Highway Traffic Safety Administration (NHTSA) determined with precision (a) dates during which the defective tires were produced at which plants; (b) the model and serial numbers of the defective tires; (c) whether production of the defective tires has ceased; and (d) whether consumers have received full information on the defective tires? If the answer is "no" to any of these questions, please elaborate and explain steps NHTSA intends to take.

Answer:

(a) Firestone's recall covers all Firestone Radial ATX and Radial ATXII tires in size P235/75R15 produced in North America from 1991 to August 2000 and all Firestone Wilderness AT tires in size P235/75R15 produced at Firestone's Decatur, IL manufacturing plant from the outset of production in March 1996 to August 2000. The majority of the recalled tires were produced at the Decatur plant. Some of the ATX and ATXII tires were produced at Joliet (Quebec), Canada, Wilson, North Carolina, Oklahoma City, Oklahoma, Laverne, Tennessee, and Albany, Georgia. NHTSA is continuing its investigation to ascertain if the scope of the recall is appropriate (i.e., whether tires from other plants and whether other tires lines should have been included in the recall).

(b) Models and serial numbers of the defective tires are as follows:
All Firestone ATX and ATXII tires in the P235/75R15 size; and
All Firestone Wilderness AT tires in the P235/75R15 size that were built in the Decatur plant.

Since there are other models of Wilderness tires (e.g., HT and LE) the following steps are necessary to identify the Wilderness AT tires from the Decatur plant: The sidewall should be

examined to see if the tire is a Wilderness AT of the designated size. If yes, the Department of Transportation (DOT) code must be examined to see if the tire was manufactured at Decatur. The DOT code is located on the blackwall side of the tire, under the "F" in Firestone. The first two letters of the DOT code indicate the plant where the tire was built. The Decatur tires have "VD" as the first two letters in the code. If those letters are not "VD," the tire is not included.

(c) Production of the defective tires ceased during the first week of August 2000.

(d) NHTSA has issued a number of statements about the recall, Firestone and Ford Motor Company (Ford) have published advertisements explaining the recall, and there has been a great deal of media coverage. In addition, as required by statute, Firestone has begun mailing notification letters to all known owners of vehicles that may have been equipped with the defective tires (primarily Ford vehicles), and is trying to identify those individuals who purchased the defective tires as replacement equipment. We understand that Ford will also be sending letters to owners of Ford vehicles that explain the recall.

2. Has NHTSA received complete responses to information it has requested from Firestone and others?

Answer:

No. NHTSA sent detailed information requests to Firestone on May 8, to Ford on May 10, and to Goodyear on August 22, 2000. Currently, Firestone has responded to 17 of the 18 requests and will submit the remaining response on September 5. Ford has responded to 15 of the 17 requests, and the remaining information is expected shortly. Goodyear has advised us that it expects to supply a full response to our letter by September 15, 2000.

3. Has NHTSA requested claims and other data on the 16-inch Wilderness AT and other models of Firestone tires that were not included in the recent recall?

Answer:

Yes. This information has been received and is being analyzed.

4. Has NHTSA completed its analysis of the data and other information it has requested from Firestone and others, and if not, when does NHTSA expect to complete this analysis?

Answer:

No, NHTSA has not completed its analysis of the information. Due to the huge volume of data that is being analyzed, the need to obtain additional information from Firestone, Ford, and other manufacturers, and the possibility that testing may be necessary, our investigation could take several more months to complete. However, if information is developed during the course of the investigation that indicates that the recall should be expanded to cover additional tires, we will act promptly to ensure that Firestone takes appropriate action.

5. Has Firestone ceased all tire production at its Decatur, Illinois plant, and if not, what model tires are being produced there?

Answer:

Although Firestone has ceased production in the Decatur plant of the 15 inch ATX and 15 inch Wilderness AT tires, it has not ceased all tire production at that plant. According to Firestone, tire production changes frequently within the plant. At any given time, there can be in excess of 60 various tire lines being produced.

6. As of the date of this letter, identify the production facilities where Firestone is producing its 15-inch Wilderness AT tire, as well as its 16-inch Wilderness AT tire.

Answer:

According to Firestone, both the 15 and 16 inch Wilderness AT tires are currently produced at plants in Wilson, North Carolina, Oklahoma City, Oklahoma, and Joliette, Quebec. The 15 inch version is also produced in the Aiken, South Carolina plant. The Decatur, Illinois plant still produces 16 inch Wilderness AT tires.

7. Does NHTSA believe that the 16-inch Wilderness AT tires which Firestone has been or may still be producing at its Decatur, Illinois plant are free of defects and do not pose safety threats to consumers?

8. Does NHTSA believe that the tires which Firestone is currently producing to replace its recalled tires are free of defects and do not pose safety threats to consumers?

9. On the basis of information and data received, has NHTSA determined that Firestone was correct in limiting its recall to the 15-inch ATX and Wilderness AT tires? If not, when does NHTSA anticipate being able to make a determination regarding the adequacy of Firestone's recall?

Answers to Questions 7, 8, and 9:

On August 30, 2000, NHTSA staff met with Firestone representatives in Washington and recommended that Firestone expand the recall to include additional tire lines and sizes. On August 31, 2000, Firestone advised NHTSA that it would not voluntarily expand the recall at this time. Since Firestone chose not to expand the recall, NHTSA on September 1, 2000 issued a consumer advisory alerting consumers that 1.4 million additional tires had tread separation rates as high or higher, than the tires that were recalled. Our investigation is continuing and making a determination as to whether the recalled tires are the appropriate population is our highest priority. As stated above, due to the volume of data and the complexity of the issues, our investigation could take several more months to complete. As additional information is developed, we will act promptly to ensure that the public has the information necessary to make an informed decision.

10. At what point in time did Firestone have enough information (a) to decide in good faith that a safety-related defect existed with the tires covered by the recall announced on August 9, 2000, or (b) to decide in good faith that the recalled tires may not comply with applicable motor vehicle safety standards? (c) When did Firestone give NHTSA notice of the recall announcement it made on August 9, 2000? (d) Has Firestone complied with requirements that are contained in the Motor Vehicle Safety Act for reporting safety-related defects to NHTSA?

Answer:

(a) and (d) Pursuant to 49 U.S.C. § 30118(c)(1), a manufacturer must notify NHTSA, and conduct a safety recall, if it “learns that the . . . equipment contains a defect and decides in good faith that the defect is related to motor vehicle safety.” Pursuant to 49 CFR 579.4(b)(2), tire manufacturers have recall responsibility for all tires, including tires installed as original equipment on new motor vehicles. We are aware that assertions have been made that Firestone failed to comply with section 30118(c)(1). At this point, we do not have sufficient information to make a judgement on that issue, but we plan to look into that matter in due course. However, as stated above, our highest priorities at this time are to identify whether additional tires should be recalled to monitor the recall to ensure the expeditious replacement of defective tires.

(b) NHTSA does not believe that any of the tires under investigation fail to comply with applicable Federal motor vehicle safety standards.

(c) Firestone verbally notified NHTSA officials on August 8, 2000, of its plan to conduct this safety recall. We received Firestone’s Defect Information report that it submitted pursuant to 49 CFR Part 573 on August 16, 2000.

We hope you find this information helpful. If we can be of further assistance, please contact me or Mr. Kenneth N. Weinstein, NHTSA Associate Administrator for Safety Assurance, at (202) 366-9700.

Sincerely,



Dr. Sue Bailey