YOKOHAMA TIRE CORPORATION
CORPORATE OFFICE
P.O. BOX 4550
FULLERTON, CA 92834-4550
PHONE: (714) 870-3800 (800) 423-4544

12T-025
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By Federal Express and e-mail (rmd.odi@dot.gov)

28 September 2012

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Defect Notifications Pursuant to Part 573

Dear Ms. Lewis,

Yokohama Tire Corporation (YTC) has decided to voluntarily recall a population of 10,669 AVID Touring S tires manufactured by YTC at its plant in Salem, Virginia (Plant Code CC). These tires were sold to YTC's authorized dealers throughout the United States and to a very limited extent into Canada. The following information is submitted in accordance with 49 CFR Part 573.

Identification of Recalled Tires:

This recall involves the tires described in the table below. All of the subject tires were manufactured in YTC's Salem Virginia factory from February 2009 through April 2009 (weeks 0709 through 1509).

Size	Description	YTC Part No	Tire Identifications (TIN)	Qty (*)
215/65R16 98T (SL)	AVID Touring S	31817	CCHB81T0709 thru CCHB81T1509	10,669

(*) Tire quantity is total produced during time period minus tires scrapped at the factory.

Description of the Condition Prompting this Action

A small number of tires within the recall population may have been produced with irregular geometry in the casing turn up area above the tire bead in the lower sidewall. Under certain limited circumstances this irregular geometry can potentially spawn a lower sidewall crack and can lead to a loss of tire inflation. Slow air loss poses a risk to motor vehicle safety. If left in service, the crack/separation could grow and rapid air loss may occur, increasing the risk of a vehicle crash.

Chronology

YTC observed an increase of warranty returns for lower sidewall cracking of the subject tires beginning in mid 2010 as part of its normal warranty surveillance activity. In March 2011, YTC observed a continued elevation of these warranty returns and immediately initiated an investigation to determine the potential cause (s) and extent of this condition. The initial findings confirmed that the affected tires were manufactured within specification and that they met and exceeded all applicable internal and external standards including those of FMVSS 139.

Since a lower sidewall crack condition is usually associated with tires that have experienced prolonged over-deflection due to either overloading or under-inflation, YTC investigated in-service use as a potential cause of the condition observed in the returned tires. YTC's investigation included new product analysis and testing, warranty returns analysis, in-service analysis, and field interviews with dealers and tire owners during the period from March 2011 through 31 December 2011.

In January 2012, YTC received a report that a 215/65R16 AVID Touring S tire had experienced a slow air loss that was verified and replaced under warranty for a customer by a YTC tire dealer. When the tire was returned and analyzed, a lower sidewall crack was found to exist and determined to be the likely cause of the tire inflation loss. Further analysis indicated that the lower sidewall crack developed as a result of irregular geometry at the location of the initial sidewall crack formation.

From March 2012 through September 2012, YTC thoroughly inspected and analyzed warranty returns, performed fatigue drum testing, conducted extensive cut sampling and section analysis of cured tires in the plant, and audited the manufacturing processes associated with the subject tires. All warranty returned tires were mounted, checked, and verified for air retention.

Subsequent investigation and scrutiny of warranty returns within this time frame indicated that some of the warranty returned tires with lower sidewall cracks exhibited an irregular geometry in the areas adjacent to the cracking. During this period, five additional tires were found to manifest air leakage adjacent to the cracking of their lower sidewalls. In some cases, the tires exhibited cracks that extended to the tire's structure, potentially posing a risk to the tires' air retention capabilities and structural integrity. YTC's analysis to date indicates that this specific geometry is present in only a small quantity of tires and that the condition may result in slow, rather than rapid air loss.

On 21 September 2012, based upon the foregoing testing and analysis, YTC decided to commence a voluntary recall of the subject tires out of an abundance of caution.

There have been no reports of any product damage claims and no reports of any accident, injury or death related to this reported tire condition.

Description of Remedy Program

YTC will conduct a voluntary recall of these subject tires in conformity with 49 CFR, Part 577. Customers who registered their tires will be notified by mail by YTC and urged to bring their vehicles and tires to YTC authorized dealers for inspection and replacement at no cost to the owner. The tire replacement program will be conducted through 31March 2013.

Yokohama dealers performing the inspection service and tire replacements will be notified of their duties and responsibilities in accordance with 49CFR Part 573.6 (c) (9). Dealers will be instructed to send all recalled tires directly to a processing point for delivery to YTC for accounting, processing and disposal.

Pre-Notification Remedy Reimbursement Program

Pursuant to Part 577.11 (e), YTC requests that it be exempt from the pre-notification remedy reimbursement requirements. All of the subject tires are within the manufacturer's limited warranty.

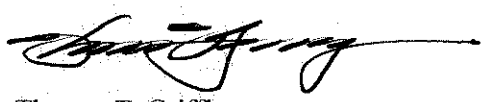
Dealer and Owner Notification Schedule

YTC will handle dealer and owner communications for this recall and plans to notify its dealers and distributors of this recall on or about 10 October 2012 and will notify owners on or about 20 October 2012.

Recall Monitoring and Reporting

YTC will submit for six, consecutive, calendar quarters, status reports concerning the current progress of this recall campaign beginning in the 31 December 2012.

Sincerely,



Thomas T. Griffing
Corporate Quality Assurance