

Revised PART 573 Defect Report

On May 23, 2008, Tech International determined that a defect which relates to motor vehicle safety exists in certain items of motor vehicle equipment listed below, and is furnishing notification to the National Highway Traffic Safety Administration in accordance with 49 C.F.R. Part 573 Defect and Noncompliance Reports.

Date this report was prepared: June 2, 2008

Furnish the manufacturer's identification code for this recall (if applicable):

No identification code has been established.

Identify the full corporate name of the fabricating manufacturer/brand name/trademark owner of the recalled item of equipment. If the recalled item of equipment is imported, provide the name and mailing address of the designated agent as prescribed by 49 U.S.C. §30164.

Fabricating Manufacturer: Shangai Baolong Industries Co., Ltd.
Maosheng Rd., Dongjing Town
Songjiang, Shanghai 201619, China

Importer: Tech International
200 E. Coshocton St.
P.O. Box 486
Johnstown, Ohio 43031, U.S.A.

Identify the corporate official, by name and title, whom the agency should contact with respect to this recall.

Scott E. Damon
Counsel for Tech International
Baker & Hostetler LLP
2300 SunTrust Center
200 South Orange Avenue
Orlando, FL 32801

Telephone Number: 407-649-4000 **Fax No.:** 407-841-0168

Name and Title of Person who prepared this report:

Scott E. Damon, Counsel for Tech International

Signed:



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OFFICE OF DEFECTS INVESTIGATION
RECALL MGMT DIV.

I. Identify the Recalled Items of Equipment

Identify the Items of Equipment Involved in this Recall, for each make and model or applicable item of equipment product line (provide illustrations or photographs as necessary to describe the item of equipment), provide:

Generic name of the item: Replacement Snap-In Tire Valve Stem

Make: Tech International

Model: TR413

Part Number: TRI413

Production Code: 061002623-01 (on packaging)

Size: TRI413 is a 1.25 inch valve stem for a 0.453 inch rim hole.

Inclusive Dates of Manufacture: July-November, 2006

Function: The item is a snap-in rubber tire air valve used for the replacement of existing tire valves (made prior to 2007) when automotive tires are serviced or replaced.

Other information which characterizes/distinguishes the items of equipment to be recalled:
The Model TR413 valve stems manufactured by Baolong have a triangle shape located on the base of the valve stem. This triangle allows the Model TR413 valve stem manufactured by Baolong to be distinguished from the same size valve stem manufactured by other companies.

II. Identifying the Recall Population

Furnish the total number of items of equipment recalled potentially containing the defect or noncompliance.

Model: TR413

Year: 2006

Number of Items Potentially Involved:
Approximately 8,600

Total Number Potentially Affected by the Recall: It is estimated that the 8,600 items of equipment were among approximately 6 million Model TR413 valve stems manufactured and installed in the pertinent time period.

Furnish the approximate percentage of the total number of items of equipment estimated to actually contain the defect or noncompliance:

Over the last several years, it is estimated that Tech International has purchased and sold millions of TR413 tire valves. It is estimated that the percentage of the production that are defective is substantially less than 1%; however, Tech International will remedy concerns with all TR413 valves as described in Section V.

Identify and describe how the recall population was determined--in particular how the recalled models were selected and the basis for the beginning and final dates of manufacture of the recalled items of equipment:

After a small number of TR413 valves were reported by customers and one distributor to have experienced an apparent failure, samples were shipped to the manufacturer, Shangai Baolong Industries Co., Ltd., for testing. On March 21, 2008, Baolong concluded that certain TR413 valves that had been manufactured between July 2006 and November 2006 could be defective, consisting of approximately 8,600 tire valves. Baolong also tested samples of all valves manufactured after November of 2006 and confirmed that the performance of such valves met the applicable industry standards and were not defective.

III. Describe the Defect or Noncompliance

Describe the defect or noncompliance. The description should address the nature and physical location of the defect or noncompliance. Illustrations should be provided as appropriate.

The defect is such that after the valve stem has been in service approximately 6 months or more, the rubber compound may undergo cracking resulting in the gradual loss of tire air pressure.

Describe the cause(s) of the defect or noncompliance condition.

The cause of the defect is likely improper mixing of the rubber compound in the manufacturer's facility.

Describe the consequence(s) of the defect or noncompliance condition.

The consequence of the defect is that the rubber portion of the valve stem may begin to crack and permit the gradual loss of tire pressure after several months of service.

Identify any warning which can (a) precede or (b) occur.

If the vehicle is equipped with a tire pressure monitoring system (TPMS), the driver would be alerted to the loss of tire air pressure. Additionally, it may be possible to visually discern whether a tire is low on air pressure.

If the defect or noncompliance is in a component or assembly purchased from a supplier, identify the supplier by corporate name and address.

Shangai Baolong Industries Co., Ltd.
Maosheng Rd., Dongjing Town
Songjiang, Shanghai 201619, China

Identify the name and title of the chief executive officer or knowledgeable representative of the supplier: Mr. Charles Zhang, General Manager/Vice President

IV. Provide the Chronology in Determining the Defect

With respect to a defect, furnish a chronological summary (including dates) of all the principle events that were the basis for the determination of the defect. The summary should include, but not be limited to, the number of reports, accidents, injuries, fatalities, and warranty claims.

In late January, 2008, Tech received notice from one distributor regarding a small number of potential valve stem failures. Following communication with the manufacturer of the valve stems, Baolong, on March 21, 2008, verified that certain TR413 valves that had been manufactured between July 2006 and November 2006 may have been defective – consisting of a population of approximately 8,600 tire valve stems. Baolong also tested samples of all valves manufactured after November of 2006 and confirmed that the performance of such valves met the applicable industry standards and were not defective. Following additional evaluation and receipt of additional reports of customer concerns regarding loss of tire air pressure, Tech determined that a defect exists. Tech is not aware of any accident, injury or fatality related to this defect.

V. Identify the Remedy

Furnish a description of the manufacturer's remedy for the defect or noncompliance. Clearly describe the differences between the recall condition and the remedy.

Tech International will replace all TR413 valves with the identifying triangle symbol on the base of the valve that are brought into the dealer for replacement based upon an apparent defect in the valve. In the event that any customer reports concerns relating to tire pressure due to an apparent defect in the valve to a tire dealer, and it is determined that the customer has a TR413 valve manufactured by Baolong, the tire dealer will replace the customer's tire valve stem and also remedy any structural damage that may have been caused by the defective tire valve stem. The remedy will be free of charge to customers. Tech International will reimburse all tire dealers for the costs associated with such efforts, including the costs associated with such efforts before the date of this report.

Tech International does not know the identity of any end-users of the TR413 valves and has no realistic method of determining the identity of such individuals. Furthermore, there is no realistic method for Tech International to identify the production dates of any specific TR413 valves. Therefore, all defective TR413 valves will be replaced free of charge as end-users report concerns relating to tire pressure to Tech dealers or distributors.

Clearly describe the distinguishing characteristics of the remedy component/assembly versus the recalled component/assembly.

The defective TR413 snap-in air valve stems will be replaced with non-defective snap-in air valve stems. Further, if a defective TR413 valve stem has caused structural damage to a tire, the tire will be replaced as necessary.

Identify and describe how and when the recall condition was corrected in production. If the production remedy was identical to the recall remedy in the field, so state. If the product was discontinued, so state.

The manufacturer of the subject tire valves, Shangai Baolong Industries Co., Ltd., has confirmed to Tech International that it has: (1) replaced the manufacturing equipment and/or materials that were the cause of the defect; and (2) increased the frequency of inspecting the sheet rubber.

VI. Identify the Recall Schedule

Furnish a schedule or agenda (with specific dates) for notification to other manufacturers, dealers/retailers, and purchasers. Please, identify any foreseeable problems with implementing the recall.

Tech International distributors were initially notified of a potential issue with the TR413 tire valve stem on May 13, 2008. Tech International will send a notification pursuant to this Report to all distributors, outlining the defect and the proposed remedy, on or about June 6, 2008. Any TR413 valves that are replaced and any tire damage that has occurred as a result of a defective TR413 valve is immediately eligible for participation in this remedy program.

Tech International does not know the identity of any end-users of the TR413 valves and has no realistic method of determining the identity of such individuals. Further, there is no realistic method for Tech International to identify the production dates of any specific TR413 valves. Thus, no notification will be sent directly to individual end-users of TR413 valves.

VII. Furnish Recall Communications

Furnish a final copy of all notices, bulletins, and other communications that relate directly to the defect or noncompliance and which are sent to more than one manufacturer, distributor, or purchaser. This includes all communications (including both original and follow-up) concerning this recall from the time your company determines the defect or noncompliance condition on, not just the initial notification.

Along with this report, Tech International submits a representative copy of the initial notification that was sent to all Tech International distributors on May 13, 2008.

Tech International will submit a draft and/or representative copies of all future communications it sends to more than one manufacturer, distributor, or purchaser as required by the applicable regulations.

TECH INTERNATIONAL

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P.O. Box 486
Johnstown, OH 43031
Phone 740/967-9015 Fax 740/967-3583
www.techtirerepairs.com

May 13, 2008

MEMO TO: All ITD's and Distributors
FROM: Todd Kirkpatrick
RE: Baolong Snap-In Valves

It has come to our attention that a few customers have experienced problems with the Baolong TRI413 or TRI418 snap-in valves. Tech International is looking into this matter and we are testing valves that are in question. Within the next two weeks, you will be receiving a document explaining correct procedures to handle any valve complaints.

We have inspected all current inventories of TRI413 and TRI418 valves and Tech can verify, based upon the attached letter, that all valve products in stock meet the SAEJ1025/1206 standards. When you receive the document explaining procedures to handle valve complaints, please review and provide us with any comments.

We appreciate your cooperation.

Regards,



05.13.08Baolong Snap-In Valves.doc

Technical Rubber Company, Inc.
Johnstown, Ohio

Tech Asia Pacific
N.S.W., Australia

Nippon Tech Inc. Tokyo
Shinagawa-Ku, Tokyo, Japan

Tech International (Shanghai) Co., LTD.
Songjiang, Shanghai, P.R., China

Tech Europe BVBA.
Turnhout, Belgium

Tech Hawaii
Waipahu, Hawaii

EuroTech B.V.
Northern Ireland, UK

Tech Latin America
Bogotá, D.C. - Columbia