President Obama announced in September of 2009 the imposition of special safeguard relief for the domestic passenger car and light truck tire industry and its workers who had been seriously harmed by large increases in imports from China in the 2004-2008 time period. The President, backed by the analysis of his Administration and by the independent analysis of the US International Trade Commission, viewed import relief as important to permit the domestic industry to recover and hard working Americans to maintain or regain jobs in the tire sector. Public data available for the first three months of relief confirm that import relief has performed as predicted by the Administration and the USITC - the large increase in imports from China has retreated, significant volume pick ups have occurred for domestic producers, jobs have been maintained and laid off workers recalled, and the industry's financial fortunes have started to turn around on their US operations. It is critical that the relief that has been in place for just a few months be left in place for the full three years ordered by the President.

ITC Views on Remedy

"We believe that the tariffs will significantly reduce subject imports and boost U.S. industry sales and prices, resulting in increased profitability. This profitability will lead to the preservation of jobs and the creation of new ones, as well as encourage investment." ITC Pub. 4085 at 30.

ITC anticipated effects	Actual effects observed				
"This duty would likely reduce shipments of subject tires by 38.2 to 58.4 percent in the first year." ITC Pub. 4085 at 37.	Imports of Consumer Tires in 000s of tires				
		4Q 2008	3 4Q	2009	% change
	China	11,234	6,	405	- 43%
	All Other	20,645	22,	,078	7%
	World	31,880	28,	,484	-11
"Although both domestic and non-subject import shipments would likely increase by 3.4 to 6.8 percent, the volume of domestic shipments is much higher than that of non-subject import shipments, and domestic shipments will thus likely enjoy a much more substantial increase." ITC Pub. 4085 at 37.	"Total light vehicle tire shipments for Cooper's North America segment in the United States increased by 22 percent, outpacing the total industry shipment increase of 7 percent reported by the Rubber Manufacturers Association. This improvement occurred across all product segments as the Company was able to increase market share in the replacement market." Cooper Tire and Rubber, 4 th Qtr 2009 Results (March 5, 2010). "Replacement tire shipments were up 2 percent. Market share gains were recorded in the consumer and commercial replacement product segments." Goodyear 4 th Qtr 2009 Results (February 18, 2010) "Slight Improvement in Passenger Car and Light Truck Markets in Q4" N. Amer. Replacement (% change YoY) 4Q 2009 +9% Michelin North America Roadshow Bank of America Merrill Lynch (March 2010)				
"The benefit provided by the tariff – a	Results for North American Tire operations				
revenue increase of 5.1 to 8.6 percent – should allow the industry	In millions of \$s		4Q 2008	4Q 2009	% change
to go from incurring operating losses to earning operating profits." ITC Pub. 4085 at 37.	Goodyear – net sa	ales	\$1,943	\$1,884	-3%
	Goodyear – oper.	income	\$-193	\$-27	86%
	Cooper – net sale		\$511	\$566	11%
	Cooper – Oper. In		\$-109	\$39	136%
	Goodyear, 4 th Quarter 2009 Results (February 18, 2010); Cooper Tire and Rubber, 4 th Quarter 2009 Results (March 5, 2010).				

U.S. Imports from China, Annually 2004 to 2009

	2004	2005	2006	2007	2008	2009
No. of Tires (000s)	14,574	20,790	27,005	41,503	45,975	42,360
FAS Value (\$000s)	387,499	592,611	803,729	1,290,926	1,553,074	1,407,936
FAS \$s / tire	26.59	28.50	29.76	31.10	33.78	33.24
Landed Cost (\$000s)	453,288	691,924	931,704	1,493,052	1,788,387	1,655,789
LDC \$s / tire	31.10	33.28	34.50	35.97	38.90	39.09

IMPORT PRICES

From January to September 2009 imports from China averaged \$38 per tire (on a landed cost duty paid basis).

From October 2009 to January 2010

imports from China averaged \$44 per tire.

This is an increase of \$6 per tire, or 16%. No where near the "doubling" from \$200 to \$400 for a set of four \$50 tires claimed by opponents of the tariff.

U.S. Imports from China, Monthly 2009-2010

	No. of Tires	Metric	Landed Cost	
	(in 000s)	Tons	(\$000s)	\$s / tire
		2009		
January	3,241	37,786	133,557	41.21
February	2,330	25,701	91,840	39.42
March	3,598	40,195	141,410	39.31
April	3,959	46,708	149,862	37.85
May	3,997	44,849	149,940	37.52
June	3,830	43,526	148,101	38.66
July	4,681	60,440	175,334	37.46
August	5,164	62,924	189,891	36.77
September	5,155	56,434	196,585	38.14
October	1,778	23,240	80,266	45.13
November	1,961	23,469	84,721	43.21
December	2,666	32,143	114,280	42.87
2010				
January	2,843	33,211	124,070	43.64

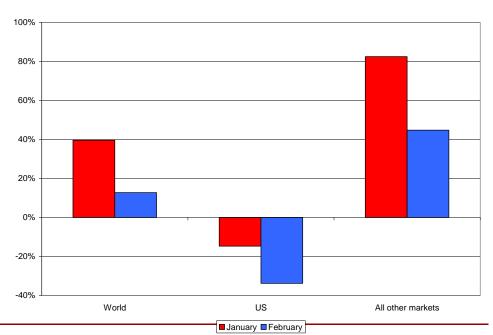
Source: Compiled from Official Bureau of Census IM145 import statistics.

China's Exports

Significant Decrease to U.S. Continues in 2010

China's exports to the U.S.	Metric tons				
decreased significantly in		World	US	All Other	US Share
October 2009 after the		:	2009		
tariffs went into effect. This	January	71,783	31,671	40,113	44%
trend has continued into	February	62,824	25,639	37,186	41%
2010, with the US share of	March	84,011	35,559	48,452	42%
•	April	86,010	39,684	46,326	46%
China's exports dropping to	May	91,034	40,031	51,003	44%
24% on a volume basis in	June	97,274	42,621	54,652	44%
February. Compared to	July	111,951	52,267	59,683	47%
February 2009, a drop of 17	August	111,278	52,104	59,174	47%
percentage points. The data	September	107,054	37,022	70,032	35%
below are just for Passenger	October	85,902	22,108	63,794	26%
Car tires, HS 4011.10, as	November	95,056	25,335	69,721	27%
China's statistics do not	December	109,826	32,361	77,466	29%
provide a breakout for Light	2010				
,	January	100,180	27,005	73,175	27%
Truck tires.	February	70,810	16,974	53,836	24%

Chinese statistics indicated that rather than increasing consumption domestically, China has increased its exports each month of 2010 compared to the same month a year ago. Absent the tariffs it is unlikely that the U.S. would be showing declines.



Source: Compiled from PRC General Administration of Customs, China's Customs Statistics.

COOPER TIRE INCREASES CAPACITY AT FINDLAY, OHIO TIRE PLANT

Findlay, Ohio, Nov. 24, 2009 — Cooper Tire & Rubber Company (NYSE: CTB) today announced that it is adding capacity at its Findlay, Ohio, tire plant with an additional \$10 million investment in automation, cost improvements and retooling to support market trends. As a result of those investments, capacity will increase and up to 100 people will be hired.

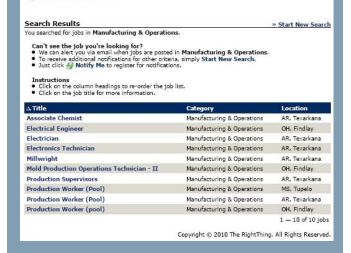
"In addition, in 2010, the Findlay plant will play a key role in Cooper Tire's launch of several new light truck, SUV and premium winter tire products," said Cooper North American Tire Manufacturing Vice President John Bodart. "Taken together, this expansion demonstrates the strong impact Findlay has on the company's strategic objectives of creating a sustainable, competitive cost position, achieving top-line profitable growth and building our organizational capabilities."

This year, Cooper has announced capacity increases and expansions of its manufacturing facilities in Texarkana, Ark., and Tupelo, Miss., as well as in its joint venture in Guadalajara, Mexico, and the Cooper Kenda Tire joint venture facility in Kunshan, China.

Source: Cooper Tire and Rubber Co. News Release

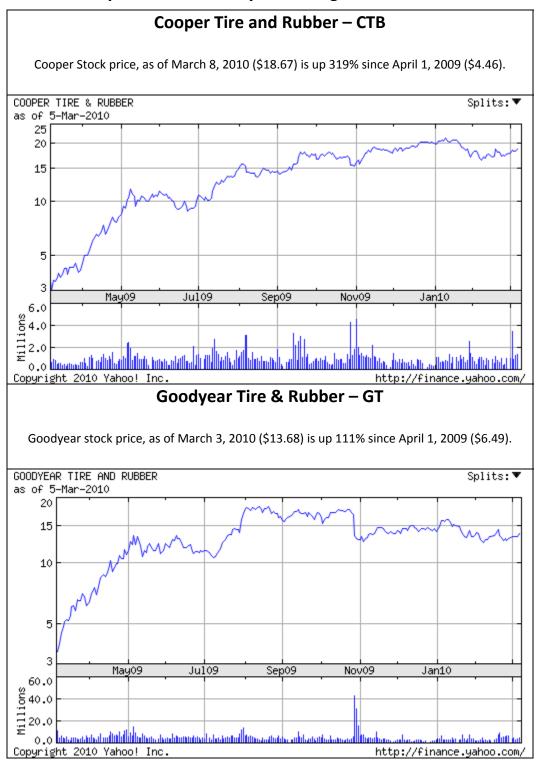
Additional manufacturing job listings at Cooper's domestic facilities:

COOPERTIRES





Cooper Tire and Goodyear adding Shareholder Value



PRICE INCREASES

Several manufacturers reported price increases taking effect from November 2009 through February 2010. Most cited escalating raw materials as the reason for the increases.

	Effective Date	Increase
Michelin	Feb 1, 2010	varies by brand, includes Michelin, BF Goodrich, Uniroyal and Private/Assoc. brands
Hankook	Jan 1, 2010	up to 5%
Toyo Tire	Jan 1, 2010	up to 6%
Pirelli NA	Jan 1, 2010	up to 4.5%
Kumho Tire USA	Jan 1, 2010	up to 8%
Yokohama	Jan 1, 2010	up to 6%
ВАТО	Jan 1, 2010	up to 5%
Continental	Jan 1, 2010	up to 5%
Nexen	Jan 1, 2010	up to 8%
Goodyear	Dec 1, 2009	up to 6%
Falken	Dec 1, 2009	up to 7 %

Source: Modern Tire Dealer, December 18, 2009



REPLACEMENT MARKET REBOUNDING

RMA members reported that replacement tire demand in the U.S. grew 9.3% year-on-year in December 2009, from a drop of 16% the year before.

Financial analysts pointed out that the overall market volume grew 6.1%, implying that domestic tire manufacturers (namely Cooper Tire and Goodyear) continued to experience market share gains. This is believed to be a result of last year's Chinese-made tire tariffs as Chinese produced tires reportedly occupied 16.6% of the US market in 2008.

Source: Tire Review, January 14, 2010

DOMESTIC TRENDS

Strong October. "Supply is tight and fill rates are declining. As business is improving, production has been increased and utilization rates are moving higher and should reach full capacity during early 2010. Truck volume is still down, however." **Low on inventory.** "(Consumer) inventory levels remain very low across the board; as such, both dealers and manufacturers are ramping up inventory in anticipation of stronger unit sales in the end of 2009 and 2010. Although increasing, several manufacturers noted inventories will not return to the high levels seen in both 2007 and early 2008."

Chinese tariffs. "Most dealers and distributors bought as much Chinese product as possible before the tariffs went into effect. After remaining flat to slightly down from March through June, Chinese passenger tire imports were up 23% and 33% in July and August, respectively, as Chinese manufacturers wanted to import as much product as possible before being hit with the tariffs.

"Prices on Chinese imported tires have risen in the range of 15-20%, which will mostly offset the tariff. As a result of the tariff, the

"Prices on Chinese imported tires have risen in the range of 15-20%, which will mostly offset the tariff. As a result of the tariff, the spread between an entry-level tire and next level up has been compressed, making entry level Chinese products a more difficult sel for dealers."

Mold movement. "In addition to raising prices, Chinese manufacturers are now shipping product and moving equipment and molds to other countries. One manufacturer noted it is moving its equipment and molds to Taiwan and Thailand from its Chinese plants. "We suspect Cooper Tire & Rubber Co. is shipping some tires from its Kenda joint venture to Europe and Mexico to offset the U.S.-imposed tariff. Although manufacturers are working hard to offset the tariff, most suspect there is not enough capacity and production in other countries such as Indonesia, Taiwan and Thailand to fully compensate for the duties imposed by the United States." Saul Ludwig, "Ludwig lists 'takeaways' from Las Vegas," Modern Tire Dealer, November 11, 2009