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Submitted to:

California Energy Commission

Dockets Office

715 P Street

Sacramento, CA 95814

Re: TIA Comments on California's Proposed Replacement Tire Efficiency Program

TN 269612, April 2026 Staff Report

Docket No. 26-TIRE-01

Dear Commissioners and staff,

On behalf of the Tire Industry Association (TIA), we appreciate the opportunity to submit comments regarding the proposed Replacement Tire Efficiency Program rulemaking.

The Tire Industry Association (TIA), established in 1921, is an international non-profit association representing all segments of the tire industry, including companies that manufacture, repair, recycle, sell, service or use new or retreaded tires, and also those suppliers or individuals who furnish equipment, material or services to the industry. TIA is the leading advocate as well as instructor in technical training of tire service technicians. TIA has more than 13,000 members from all 50 states and around the globe. TIA has 1,102 members in the state of California. As the industry leader in tire service technician training, TIA has trained and/or certified more than 200,000 people since 1997.

TIA would first like to thank the California Energy Commission (CEC) for its continued engagement with industry stakeholders throughout this process and for listening to concerns previously raised by TIA. We appreciate the Commission's willingness to consider practical implementation issues and the real-world impacts these regulations may have on consumers and small businesses.

While we recognize the goals of improving efficiency and reducing emissions, TIA remains concerned that the current proposal could create several unintended consequences affecting consumers, independent tire dealers, and overall highway safety.

First, we believe the proposal will significantly reduce consumer choice in the replacement tire market. Consumers rely on a broad range of tire options based on vehicle type, driving conditions, affordability, weather considerations, and performance needs. Restricting the availability of certain entry-level all-season replacement tires through an approved list framework could limit access to products that many consumers currently depend on and trust.



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Second, TIA is concerned that the proposal could unintentionally create safety issues by encouraging increased use of older and used tires. If consumers face higher replacement tire costs or fewer available options, some may delay replacing worn tires altogether or turn to lower-cost used tires that may not provide the same level of safety, reliability, or performance. This outcome would run counter to the shared goal of improving roadway safety and environmental performance.

Similarly, we are concerned that some consumers may simply run their existing tires longer to avoid replacement costs. Delaying replacement beyond recommended tread life increases the risk of tire failure, particularly during adverse weather conditions, and raises important public safety concerns.

California Energy Commission (CEC) staff estimates that the proposed low rolling resistance (LRR) tire regulations would increase the average cost of a single passenger replacement tire by approximately \$6.50. TIA disputes this estimate based on real-world market pricing, product availability, and the limited number of tested replacement tires capable of meeting the proposed standards.

The chart below evaluates the most common passenger vehicle registration category in California (2017 Honda Civic) and the most common replacement tire size associated with that vehicle type (215/55R16). TIA reviewed replacement tire pricing from major California online tire retailers using a California zip code and compared those products against rolling resistance testing information referenced by the Commission.

Since none of the RRC values are provided by the tire manufacturers or the tire retailers, TIA researched all of the tires that were available in a 215/55R16 for each retailer. Tires that were marketed as low rolling resistant or fuel efficient are identified by the description in the chart while the all season tires contained no marketing information that would lead a consumer to believe they are fuel efficient.

The Commission's own testing data demonstrated that only half of the tires tested in this size were capable of meeting the proposed Phase 1 requirements and none of the tested products met the proposed Phase 2 standard. This raises significant concerns regarding future consumer cost increases, replacement tire availability, and reduced market competition.

The pricing data summarized in the chart demonstrates that the projected consumer cost impacts associated with the proposed regulations may be substantially higher than the approximately \$6.50 per tire estimate provided by CEC staff.

TIA's review found the following average retail pricing comparisons:

- Average Price for Phase 1 Compliant CEC Tested Tires = \$117.36
- Average Price for Tires Marketed as LRR for Sale in California = \$157.37
- Average Price for All Season Entry-Level (No LRR) for Sale in California = \$81.30

These figures demonstrate a significant price gap between commonly purchased entry-level replacement tires and tires specifically marketed as low rolling resistance or fuel-efficient products. Based on the pricing review, consumers may experience increases far greater than \$6.50 per tire if replacement options become limited primarily to compliant LRR products.

For consumers purchasing a full set of four tires, the difference between currently available entry-level replacement tires and LRR-marketed products could exceed \$300 per vehicle in some cases. This would disproportionately impact lower-income and cost-sensitive consumers who depend on affordable replacement tire options.

The chart also demonstrates that many commonly available all-season replacement tires currently sold through major retailers do not appear to be marketed specifically as LRR products. If these products are unable to meet future regulatory thresholds, California consumers could face reduced product

availability, fewer replacement options, and increased market concentration among a smaller number of compliant tire models.

TIA believes the data supports the conclusion that the proposed regulations could create substantially higher real-world consumer costs than currently estimated by the Commission, particularly during the transition period before compliant replacement tire availability significantly expands.

2017 Honda Civic

Tire Size	Smithers ID	Ave. RRC	Phase 1	Phase 2	Brand	Retailer	LRR	Price
215/55ZR16 93W	2202776-8	10.33	N	N				\$139.00
215/55RF16 93V	2202782-4	10.92	N	N				\$168.15
215/55R16 97H	2202552-4	8.79	Y	N				\$102.00
215/55R16 97H	2202202-4	9.8	N	N				\$145.99
215/55R16 97H	2203307-9	7.88	Y	N				\$77.74
215/55R16 93V	2203256-8	10.18	N	N				\$89.26
215/55R16 93H	2202944-6	8.14	Y	N				\$157.70
215/55R16 93H	2203498-500	8.16	Y	N				\$132.01
215/55R16 93V					Radar	TireRack	All Season	\$83.54
215/55ZR16 93W					Advanta	TireRack	Touring	\$93.48
215/55R16 93V					Michelin	TireRack	Eco Focus	\$175.00
215/55R16 93V					Bridgestone	TireRack	Eco Focus	\$176.99
215/55R16 97H					Continental	TireRack	Eco Focus	\$150.99
215/55R16 97H					Yokohama	TireRack	Eco Focus	\$158.99
215/55R16 97H					Hankook	TireRack	Eco Focus	\$127.99
215/55R16 97H					Sentury	America's Tire	Touring	\$67.00
215/55R16 97H					Entry Level	America's Tire	All Season	\$56.00
215/55R16 93V					Phantom	America's Tire	All Season	\$89.00
215/55R16 97H					Uniroyal	America's Tire	All Season	\$104.00
215/55R16 97W					Sailun	Midas	All Season	\$119.00
215/55R16 97H					Sailun	Midas	All Season	\$86.99
215/55R16 97V					Hankook	Midas	Ventus LRR	\$139.99
215/55R16 97H					Starfire	Pep Boys	All Season	\$84.99
215/55R16 97H					Continental	Pep Boys	EcoPlus	\$163.99
215/55R16 93V					Michelin	Pep Boys	Energy Saver	\$241.99
215/55R16 97H					Sailun	Big O	All Season	\$79.99
215/55R16 97H					National	Big O	All Season	\$103.99
215/55R16 93V					Michelin	Big O	Energy Saver	\$221.99
215/55R16 97H					Mastercraft	Tires Direct	All Season	\$92.82
215/55R16 97H					Advanta	Tires Direct	All Season	\$79.00
215/55R16 93H					Hankook	Tires Direct	Kinergy	\$169.99

Source: TIA review of CEC/Smithers rolling resistance testing data and publicly available retail pricing from major California tire retailers.

TIA is also concerned about the economic impact on tire dealers located near the border. Dealers may face significant complications regarding inventory, product availability, and compliance requirements. In practice, many consumers may simply travel across state lines to purchase replacement tires that are not included on the approved CEC list. Such an outcome could disadvantage California businesses and dealers while doing little to achieve the intended policy objectives.



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Independent tire dealers, many of whom are small businesses, already operate in an increasingly complex regulatory environment. Additional state-specific restrictions could create supply chain challenges for businesses serving consumers across multiple states.

TIA respectfully urges the Commission to carefully consider these potential unintended consequences as the rulemaking process moves forward. TIA believes any final program should balance efficiency objectives with consumer affordability, market flexibility, small business impacts, and, most importantly, roadway safety.

TIA also believes there are additional opportunities to improve fuel economy and reduce emissions through consumer education and maintenance practices. Encouraging proper tire inflation across the vehicle fleet would likely have one of the most immediate and significant impacts on fuel economy, tire longevity, and consumer savings. Properly inflated tires improve efficiency, extend tread life, and enhance vehicle safety without limiting consumer choice or creating market disruptions.

We appreciate the opportunity to provide comments and look forward to continued engagement with the Commission on these important issues.

Sincerely,

Richard "Dick" Gust  
Chief Executive Officer  
Tire Industry Association

Kevin Rohlwing  
Chief Technical Officer  
Tire Industry Association

Roy Littlefield IV  
Vice President of Government Affairs  
Tire Industry Association