

<b>DOCKETED</b>	
<b>Docket Number:</b>	26-TIRE-01
<b>Project Title:</b>	Tire Efficiency Rulemaking
<b>TN #:</b>	270572
<b>Document Title:</b>	JATMA Comments on Tire Efficiency Rulemaking
<b>Description:</b>	N/A
<b>Filer:</b>	Spencer Kelley
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	6/11/2026 4:07:46 PM
<b>Docketed Date:</b>	6/11/2026



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June 9, 2026

California Energy Commission  
Docket Unit  
Docket No. 26-TIRE-01  
715 P Street, MS-4 Sacramento, CA 95814

Subject: JATMA Comments on Tire Efficiency Rulemaking  
[Docket No. 26-TIRE-01]

To whom it may concern,

We, the Japan Automobile Tyre Manufacturers Association Inc., are representing the tire manufacturers of Japan including Bridgestone Corporation, Sumitomo Rubber Industries, Ltd., The Yokohama Rubber Co., Ltd., and Toyo Tire Corporation.

We are pleased to be given this opportunity to comment on the "Tire Efficiency Rulemaking". We have analyzed the proposal in detail and would like to express our views on the content of TN #269612 and TN #269617.

Phase 2 Value of the RRC Minimum Performance Standard (MPS)

Section 25772 of the Public Resources Code stipulates the following.

"On or before July 1, 2007, the commission, in consultation with the board, shall, after appropriate notice and workshops, adopt and, on or before July 1, 2008, implement, a tire energy efficiency program of statewide applicability for replacement tires, designed to ensure that replacement tires sold in the state are at least as energy efficient, on average, as tires sold in the state as original equipment on new passenger cars and light-duty trucks."

Based on this provision, the alternative proposals from USTMA and TRAC have been rejected.

However, the "Staff Proposal" does not discuss setting the MPS based on the average value for replacement tires; instead, it is setting the MPS based on the average value for original equipment (OE) tires (7.1) as a necessary condition.



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As a result, the proposed MPS for Phase 2 is highly probable to excessively limit even by the provisions of the Public Resources Code.

In order to ensure that the energy efficiency of replacement tires is equivalent to that of original equipment (OE) tires, the MPS is necessary to be determined by taking into account the average values, distribution, and statistical variation of replacement tires.

In practice, when the tire manufacturers supply original equipment tires to the replacement market, half of the those tires will fail to meet the Phase 2 MPS, which will hinder the supply of both replacement tires to the replacement market as well as original equipment tires to the OEM's. In other words, this code will tremendously affect not only the tire manufacturers, but also the OEM's.

#### Definition of Laboratories Dedicated to RRC Alignment

Regarding the European network laboratories, the laboratories with which alignment is to be established are defined as those listed in European Commission Communication 2012/C 86/03 in the Official Journal of the European Union, plus the RDW of the Netherlands, and appear to be limited to the reference laboratories specified in Regulation (EU) 2020/740. The European Network of Laboratories is not composed solely of reference laboratories. (Ref. attachment 1)

Since laboratories participating in the network are managed in the same manner as reference laboratories, we would like to ask you to designate the alignment laboratory as one participating in the network.

#### Wet Grip Minimum Performance Standard (MPS)

The Wet Grip requirements are considered to be duplicate regulations, as they constitute performance requirements similar to the traction requirements for tire ratings specified in 49 CFR 575.104, Uniform Tire Quality Grading Standards (UTQGS).

Therefore, for tires labeled with UTQGS grades "A" or "AA," we would appreciate your consideration to exempt them from this testing.

#### Reference Standard for Wet Grip Testing

Although ISO 23671:2021 is specified as the test method, LT tires are excluded from this standard. Therefore, we consider that ISO 15222, which covers LT tires, should also be adopted.



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### Definition of Tires Exempted from the Code

In this proposal, deep-tread tires are exempted from this code. The definition of these tires are specified as a minimum tread depth of 18/32 inches (approximately 14 mm). On the other hand, under UN R117, professional off-road tires (POR) are exempted as a similar tire type as deep-tread tires, but the tread depth is specified as 11 mm or more for C1 and C2 tires and these tires would not be exempted from this code. Applying environmental regulations (code) to POR tires could potentially increase tire development costs or prevent the tires from performing adequately in their intended operating environments. Therefore, tires that fall under the POR category are generally exempted from the environmental regulations. Also in this code, Temporary-use tires are required to display a “T” in the size designation, which represents T-type tires. However, tires that meet the definition of temporary-use tires include not only T-type tires, but also those marked “Temporary use” in the metric size designations and intended for use with general inflation pressures. We propose that definitions for both deep-tread tires and temporary-use tires reflect the actual market conditions.

### Tire Sizes to be Registered in the Database

If the ‘Basic Model’ defined in 3302(6) of TN # 269617 is to be considered as the unit to be entered into the database specified in 3304(a)(1) of TN # 269617, it appears that all tire sizes must be registered in the database.

We would like to request that, similar to the certification units under UN R117, the registration of representative sizes based on worst-case criteria be permitted.

### Information of RRC to be Entered into the Database

It is necessary to enter the RRC value after alignment into the database, but since entering the rating is sufficient as required in the EU and other countries, we would like this requirement to be removed.

### Registration of non-compliant tires in the database

Although there is a requirement to enter data into the database even if the relative wet grip braking performance index is less than 1. We believe this requirement is unnecessary because such tires cannot be sold.



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Submitting Tire Information to the Database

LT tires are not subject to 49 Code of Federal Regulations Part 575.104, which prescribes UTQG requirements. However, based on sections 3305(b)(6)(I), (J), and (K), it can be interpreted that even LT tires without UTQG markings are required to undergo testing in accordance with sections 3303(e), (f), and (g), determine Traction, Treadwear, and Temperature ratings, and report those ratings to the database.

We would like to request that it be clearly specified that LT tires are excluded from the requirements set forth in sections 3305(b)(6)(I), (J), and (K).

We would like to reiterate our appreciation for the opportunity to express our comments. Should you have any questions about our comments, please do not hesitate to contact us.

Yours very truly,

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Satoru Otaka

Secretary General

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