

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	270624
Document Title:	Peter A Beaver Comments - Comments Opposed to the Tire Efficiency Rulemaking
Description:	N/A
Filer:	System
Organization:	Peter A Beaver
Submitter Role:	Public
Submission Date:	6/15/2026 4:16:37 PM
Docketed Date:	6/15/2026

Comment Received From: Peter A Beaver
Submitted On: 6/15/2026
Docket Number: 26-TIRE-01

Comments Opposed to the Tire Efficiency Rulemaking

Original equipment tires give very poor tread mileage. Of the 3 new EV's I have purchased since 2017, the best mileage was from the tires that are on my 2024 Ioniq 5 and that was 14,250 miles. Replacement tires can have tread-life warranties exceeding 50,000 + miles. I see no numerical cost comparisons of replacement tire costs, just a non-specific statement that such tires exist. My Ioniq 5 has 19 inch tires. The 19 inch replacement tire cost found in Table 2 is \$244. My replacement tires were \$120 each. That is \$496 every tire replacement cycle. In my case that is every 2 years. This cost far out-shadows your proposed fuel savings.

Additionally, tire inflation pressure has a large effect on a tire's rolling resistance. You make no mention anywhere about this fact. In Table 1, tire inflation pressures are not given at all. In Table 2, pressures are given and heavy duty tire pressures are less than 32 psi. My passenger car tires were all 38 psi, as listed on the door post sticker. Testing at unspecified pressures, and at artificially reduced pressures leads to the belief that the data could be skewed or misleading.

Others have mentioned the additional cost of disposal of worn tires due to decreased tread-life. You don't have any mention of these costs.

Please just leave this a data gathering effort and do not attempt to make it into a misguided regulation.