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Bridgestone Comments on CEC Replacement Tire Efficiency Program

Additional submitted attachment is included below.



BRIDGESTONE AMERICAS, INC.
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Nashville, TN 37201

June 16, 2026

California Energy Commission

Docket Unit

Docket No. 26-TIRE-01

715 P Street, MS-4

Sacramento, CA 95814

RE: Comments on Tire Efficiency Rulemaking (Docket No. 26-TIRE-01)

I. Introduction and Overview

Bridgestone Americas Tire Operations, LLC (Bridgestone) welcomes the opportunity to provide comments in response to the California Energy Commission’s (CEC’s) Proposed Replacement Tire Efficiency Program (Docket No. 26-Tire-01, April 24, 2026) regarding CEC’s intent to adopt a replacement tire efficiency program “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” (Assembly Bill 844, codified in Public Resources Code Sections 25770 through 25773).

For over 90 years, Bridgestone has used advanced research and technology to develop products and services that provide trusted performance, allowing Bridgestone to Serve Society with Superior Quality. Bridgestone continues to build on that legacy of product innovation to continually deliver improved safety, increased efficiency and sustainable solutions. In looking towards 2050, the company established the Bridgestone E8 Commitment, which is eight values to solidify Bridgestone’s commitment to a more sustainable world – Energy, Ecology, Efficiency, Extension, Economy, Emotion, Ease and Empowerment.

Since its initial draft rulemaking on the Replacement Tire Efficiency Program (Draft Framework of California’s Replacement Tire Efficiency Program, Docket Number 20-TIRE-01, February 2023), CEC has worked diligently with the tire industry to understand the best way to create value with its Replacement Tire Efficiency Program not only for the state of California, but for the tire industry, consumers and society. Bridgestone appreciates CEC’s willingness to listen and learn about the



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complexity of tire manufacturing, including planning cycles, performance tradeoffs, unintended consequences of regulatory action, and other industry concerns. The current draft rulemaking on the Replacement Tire Efficiency Program (Docket No. 26-Tire-01, April 24, 2026) has addressed many of Bridgestone’s initial concerns with CEC’s original 2023 proposal and has made the requirements more achievable.

Bridgestone respectfully requests that CEC consider the following points to ensure that the Replacement Tire Efficiency Program is both achievable and consistent with broader tire regulations.

II. Applicability and Tire Categories

a. Run-Flat Tires

Bridgestone requests that CEC exclude run-flat tires from the scope of the regulation. Run-flat tires require the capability to drive up to 50 miles at 50 mph to ensure the driver can safely get off the road in the event of a flat tire. They must also be identified on the sidewall with a self-supporting tire marking (ISO 16992:2018, *Passenger car tires – spare unit substitutive equipment (SUSE)*). The structure of the run-flat tire is more rigid due to a reinforced sidewall to support the tire safely when it loses air. The reinforced structure is necessary for this safety feature but does result in the tire having a higher rolling resistance value. Additionally, run-flat tires often replace the spare tire in a vehicle as the spare unit equipment and are considered spare unit substitutive equipment; therefore, they are not produced at the same volume as normal passenger tires. Since run-flat tires constitute a very small percentage¹ of the market and serve a unique purpose, CEC should exclude them from the regulation.

b. Low-Load-Index-Tires

Bridgestone supports CEC’s categorization of Low-Load-Index-Tires and acknowledgement that load index plays a role in rolling resistance performance. Bridgestone requests that CEC amend the definition of Low-Load-Index-Tires to be defined as those with a load rating of 94 or less, as it

¹ In 2025, RFT tires made up approximately 1.9% of the market in the U.S. (USTMA Tire Reporting Program).

more accurately captures the performance gap between low load index and rolling resistance than the proposed definition of load rating 91 or less.

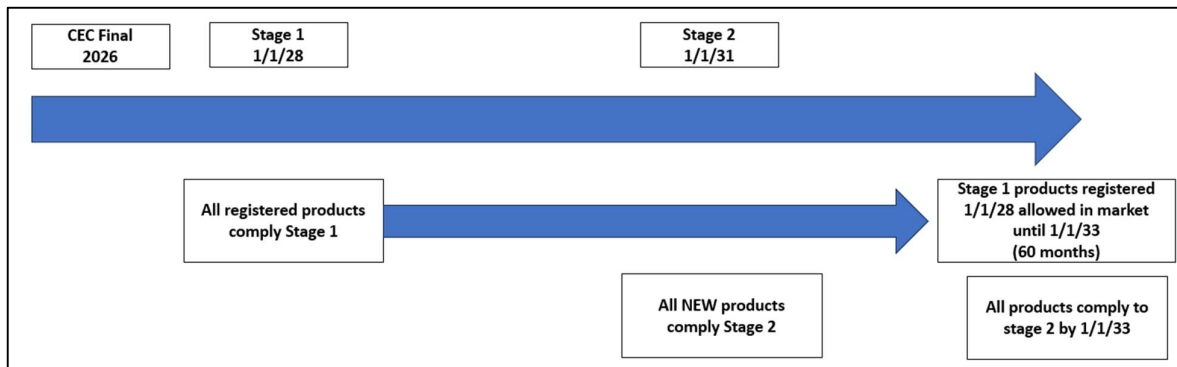
c. Light Truck (LT) Tires

Bridgestone recommends that LT tires be considered outside the scope of this regulation until issues surrounding the wet traction test method appropriate for these tires can be resolved. The applicable wet traction test standard, ISO 23671:2021, *Passenger car tires – Method for measuring relative wet grip performance – Loaded new tires*, was developed for and validated on passenger car tires only. Bridgestone reinforces the U.S. Tire Manufacturers Association (USTMA) comments on Wet Grip and LT and refers CEC to the details in the June 2026 USTMA comments.

III. Timeline

Bridgestone supports CEC’s two-phase approach to the energy performance standard portion of the program, which better aligns with the product development lifecycle of tires. Notwithstanding, given the RRC change from Phase 1 to Phase 2, Bridgestone recommends Phase 2 be extended from 2031 to 2035 to allow the tire industry to adjust its product development lifecycle for compliance to the program. The RRC change over the course of a 3-year period is extremely short in a typical product development lifecycle for tires.

If CEC cannot adjust Phase 2 to extend to 2035, then Bridgestone recommends a transition period for each Phase, where existing products that comply with Phase 1 limits are allowed to remain in the market a certain amount of time past the Phase 2 deadline. All new products are then required to meet the Phase 2 deadline on its exact date. *See illustration below.*



IV. Compliance Margins and Measurement Tolerances

Bridgestone encourages CEC to incorporate appropriate compliance margins and measurement tolerances into the regulatory tire performance requirements. All physical test methods used to evaluate tire performance are subject to measurement variability due to factors such as ambient temperature fluctuations, track surface conditions, and production variation from tire to tire. Other existing tire performance labeling and grading regulations provide compliance margins and measurements tolerances, and Bridgestone encourages CEC to be consistent with existing regulations². Bridgestone reinforces USTMA’s comments on compliance margins and measurement tolerances and refers CEC to the details in June 2026 USTMA comments.

V. Database and Reporting

Bridgestone requests that the EU-correlated rolling resistance value field required in the database remain confidential. Tire manufacturers apply an internal margin on performance test results, which could change a leaf rating from a 4-leaf to a 3-leaf-rated tire, for example. If the actual value is disclosed, it would allow customers and competitors to understand each company’s strategy in how they apply margin internally. There are no other tire performance labeling and grading regulations that require the actual value be declared publicly. The values, if provided, are provided in documentation to the government agency only.

² UNECE Regulation 117 and the EU Tyre Labelling Regulation (EU 2020/740); Brazil Regulation No. 379 (14 September 2021).



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VI. Enforcement

Bridgestone encourages the CEC to implement and maintain strong enforcement of the Program upon its effective date. Consistent enforcement across all market participants is essential to prevent competitive disadvantages for those that comply with the regulation.

VII. Conclusion

Bridgestone appreciates the opportunity to provide feedback on the California Energy Commission's (CEC) Proposed Tire Efficiency Program. The Company remains committed to collaborating with the tire industry and the CEC to develop a practical, achievable regulation that delivers meaningful benefits to all stakeholders.

Bridgestone appreciates the CEC's consideration of these comments.

Sincerely,

Nicole Avramovich
Director, Governmental & Regulatory Affairs
Bridgestone Americas Tire Operations, LLC



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