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*Comment Received From: Jeffrey Gunawan  
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## **Opposition to Proposed Replacement Tire Efficiency Program**

I oppose the proposed Replacement Tire Efficiency Program under Docket 26-TIRE-01 in its current form. While improving efficiency is a reasonable goal, tire selection involves important tradeoffs among wet and dry traction, braking, handling, durability, load capacity, climate, vehicle design, and intended use. A broad minimum rolling-resistance standard could reduce access to safe, specialized, low-volume, winter, performance, and vehicle-specific tires—*not* because they are unsafe, but because they do not fit a one-size-fits-all efficiency target or are too costly to certify for California.

Please substantially revise the proposal to preserve consumer choice and vehicle safety. At minimum, the Commission should provide clear exemptions for specialized and low-volume tires, use validated testing for each tire category, analyze the effect on tire availability and cost, and prioritize transparent labeling and consumer education over sales restrictions. Californians should be able to choose the tire best suited to their vehicle and driving conditions.