

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	270675
Document Title:	Hankook Tire America Corporation; KUMHO TIRE U.S.A., INC; The Go Comments - Hankook Tire America Corporation; KUMHO TIRE USA, INC; The Goodyear Tire & Rubber Company response to 26-TIRE-01 Docket
Description:	N/A
Filer:	System
Organization:	Hankook Tire America Corporation; KUMHO TIRE U.S.A., INC; The Go
Submitter Role:	Public
Submission Date:	6/17/2026 1:23:37 PM
Docketed Date:	6/17/2026

Comment Received From: Hankook Tire America Corporation; KUMHO TIRE U.S.A., INC; The Go

Submitted On: 6/17/2026

Docket Number: 26-TIRE-01

Hankook Tire America Corporation; KUMHO TIRE USA, INC; The Goodyear Tire & Rubber Company response to 26-TIRE-01 Docket

Additional submitted attachment is included below.



June 16, 2026

Mr. David Hochschild
Chair
California Energy Commission
715 P Street, MS-32
Sacramento, California 95814

Dear Chair Hochschild:

The following members of the United States Tire Manufacturers Association (USTMA) appreciate the opportunity to comment on the California Energy Commission (CEC) proposed regulation to increase the efficiency of passenger car and light-truck replacement tires pursuant to Assembly Bill 844 (Nation, Chapter 645, Statutes of 2003).

We look forward to actively engaging with CEC to achieve shared goals and make the following requests.

1.) Pause adoption of Phase One to fully address the shared concerns communicated by both USTMA and Tire and Rubber Association of Canada (TRAC) to the CEC regulatory docket on this initiative on March 23, 2023.

As stated in in the 2023 comments and still valid today, the proposed regulation assessment of performance tradeoffs does not recognize or illustrate the relationships that exist among tire efficiency, wet traction and treadwear performance in the consumer tire market. If implemented, the proposal would devastate the new tire market in California, eliminate consumer choice for replacement tires, threaten tire and vehicle safety by causing delays in tire purchases (e.g., a consumer driving on bald or damaged tires) and encourage inappropriate or unsafe tire purchases (e.g., unsafe used tires) and increase scrap tire generation in California. USTMA and TRAC recommendations from 2023 shown below are still valid and we encourage CEC to conduct additional evaluation with industry on these points.

- (A) Adjust the tire efficiency minimum performance standards to ensure no adverse impact on tire safety, tire tread life or the California waste tire program, as required by AB 844.
- (B) Adopt an implementation schedule that accommodates product design cycles, manufacturing capability/capacity, vehicle, and consumer needs and minimizes disruption to the consumer tire market.

(C) Coordinate with the National Highway Traffic Safety Administration (NHTSA) and Transport Canada/Natural Resources Canada to develop a North American approach to tire consumer information and standards.

2.) Ensure that the Phase One design adopts processes for evaluating Phase One costs and benefits to the consumer and the environment, as well as required enforcement and surveillance mechanisms necessary to achieve desired success and avoid circumvention of the regulation.

3.) Once Phase One has been implemented and fully evaluated by CEC and industry stakeholders for a predetermined amount of time, develop Phase Two using lessons learned and accumulated experience from Phase One.

We look forward to actively engaging with the CEC to address these concerns and achieve global compliance with the requirements and ensure alignment with both the statutory framework and broader economic considerations.

Thank you for your time and attention to this critical issue for U.S. manufacturing and we look forward to continued dialogue.

Sincerely,

Hankook Tire America Corporation
KUMHO TIRE U.S.A., INC
The Goodyear Tire & Rubber Company

cc:

Honorable Gavin Newsom, Governor, State of California
Wade Crowfoot, Secretary for Natural Resources, State of California
Nancy Skinner, Commissioner, California Energy Commission