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*Comment Received From: Saurabh Kulkarni for 86 Challenge
Submitted On: 6/17/2026
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This will destroy amateur motorsport

See attached PDF, with no hyperlinks.

Additional submitted attachment is included below.

Introduction

My name is Saurabh Kulkarni, and I am a resident of San Jose. I participate in an amateur time-trial racing series called 86 Challenge. We pride ourselves on affordability - we were featured in *Grassroots Motorsport* magazine as the most affordable time attack series in the country. We give driving enthusiasts a safe, responsible way to engage in this popular hobby. The number one barrier to entry is cost, and this regulation jeopardizes our existence by increasing the cost of specialty tires or outright banning them. I have several complaints with the proposed regulation and have included constructive alternatives to execute the vision of AB 844 while protecting car enthusiasts.

Problem 1: Information vs. Enforcement

AB 844 was passed in 2003, when many constituents, especially the young driving enthusiasts who would be affected most, were too young to vote, or not even born. It contains two distinct mandates: to create and maintain a database of tire rolling resistances, and to ensure replacement tires are at least as efficient as OE tires [2, Intro]. 23 years have passed since this bill passed, and yet no database has materialized. The state has neglected its duty to inform consumers and facilitate informed choices, but instead of owning this failure, it is moving to impose its will on the public, despite a large portion of the constituency never voting for such action.

Proposed Solution: The CEC must decouple the mandate to inform the public from the mandate to regulate tire sales. Consumers are self-interested, and given truthful, objective information about rolling resistance and resulting fuel costs, they will rationally choose the tire that best fits their use cases. The state must give the public a minimum of 7 years with such information before determining whether limiting consumer choice is necessary. It is appalling that the state finds it appropriate to skip the information step entirely and move directly to enforcement.

Problem 2: SKU Exemption is Regressive

The proposed regulation suggests a 15,000-unit per “basic model” exemption [1, Page 2; 2, § 3302(a)(24)]. This creates an easily manipulated loophole and a regressive market distortion. The Express Terms define a Basic Model as all units that share identical dimensions, rubber compounds, and tread patterns [1, § 3302(a)(6); 2, § 3302(a)(6)]. This can be gamed by the largest corporations because they have the resources and agility to alter their lineups to ensure more of their tires fall under this exemption. Smaller, foreign manufacturers that fill the low end of the market cannot afford to do so, resulting in weaker competition.

Even if SKU gaming is defeated, using dimensions to define units sold is fundamentally regressive. A size like 225/45/17 is used by millions of cars like Honda Civics, Toyota Corollas, Mazda Miatas, and Toyota 86s, and by 86 Challenge. Meanwhile, a size like 305/30/20 is used primarily by Porsches, McLarens, Ferraris, Aston Martins, etc. which drive much fewer miles and cost hundreds of thousands of dollars. The flat per-size exemption ensures that only the wealthy elite can afford amateur motorsport, while the working class who modify affordable cars for motorsport are left behind.

Proposed Solution: The CEC must modify the exemption to follow the footsteps of CAFE (Corporate Average Fuel Economy) standards. Manufacturers should target a certain level of RR for their tires each year, and fines for exceeding such a threshold should scale with the revenue the manufacturer generates. This ensures that the most popular tires are the most efficient without unduly penalizing small companies or working-class enthusiasts. The CEC may also consider normalizing the exemption threshold across sizes according to current sales figures.

Problem 3: Grassroots Motorsport Dies

The proposed regulation mandates that only tires approved by the CEC can be sold in California, with limited exemptions for wholesale exports, retreads, emergency vehicles, or “last resort” waivers [1, § 3301(a); 2, § 3302(a)(52); 2, § 3306(h)]. This fails to carve out any exemption pathway for amateur sport tires. These tires are used by enthusiasts for high-power cars, drag racing, autocross, time-trials, and HPDE events. Amateur enthusiasts need affordable, street-legal, track-ready tires. Despite being built for a different purpose than OE tires, they are treated as OE replacements, subject to the same requirements of rolling resistance and wet grip.

The regulation mandates a “minimum relative wet grip performance index of 1.0” [2, § 3302(a)(5); 2, § 3308(a)]. While intended to ensure manufacturers do not produce dangerously slippery tires, it bans highly durable, low-tread racing tires such as Michelin Cup 2, Kumho V730, Maxxis RC1, and Yokohama AD09. These tires cannot provide the same grip as a typical all-season tire in cold/wet conditions, but are safe when driven with caution and are much more durable for track conditions.

Proposed Solution: Tires marked 300tw or less are never chosen by consumers looking to save money; they are chosen by drivers who need specific performance. A simple solution is to exclude all tires marked 300tw or less, but require retailers to show a warning that these tires do not meet state requirements for wet grip or rolling resistance and must not be resold as OE replacements. Manufacturers should be mandated to put warning stickers on the sidewall that must be removed by the consumer.

Problem 4: Blind Spots in the Lab Studies

The ISOR claims the regulation will not diminish tire life or increase scrap, relying on Smithers Lab Studies that only tested ISO 28580 for RR and ISO 23671 for wet grip [3; 4]. There was no testing of treadwear in real-world conditions, no test of puncture resistance, and no test of resistance to sidewall cuts. The tests assumed tread life can be predicted solely by the UTQG Treadwear rating, which is false [6]. The tests also assumed that tire scrap generation is determined purely by tire life, but tire life can be shortened via punctures or sidewall cuts. 35% of cars are AWD [5], and in the event of a puncture, often all 4 tires must be immediately replaced to maintain equal diameters.

Thus, manufacturers must NOT be unduly incentivized to remove plies from their tire designs to meet the RR target. To ignore this blind spot would be to endanger millions of Californians who

rely on their cars to transport them across dense urban environments, remote areas with harsh weather and poor cell service, or areas with broken or gravel roads.

Proposed Solution: At a minimum, the CEC must design a test that ensures tires are durable enough for real-world conditions. For example, ASTM F414 describes a plunger test [7]. The CEC can also allow consumers to file reports for tire punctures or sidewall cuts, and penalize manufacturers that produce tires that fail too often relative to other tires in their class. The CEC can also scale RR targets with sidewall/tread thickness to ensure that more durable tires aren't unduly penalized.

Summary

- The RR database was mandated by AB 844; it should be created and maintained for at least 7 years before any consumer choices are restricted.
- SKU gaming must be locked down via legislation before any exemption framework is codified.
- Grassroots motorsports are a safe, legal hobby; banning performance tires will kill this community and potentially increase illicit street racing.
- Exemptions must be equitable to ensure working-class enthusiasts aren't blocked from purchasing specialty tires while the wealthy consume unrestrictedly.
- Motorsport compounds cannot compete with OE tires in cold/wet conditions or in RR; sub-300tw tires should be exempted with clear consumer warnings.
- Tires not exempted must maintain minimum puncture resistance; deleting plies to meet RR targets will enrich companies while burdening and endangering Californians.

Thank you for your consideration,
Saurabh Kulkarni
86challenge

Reference List

1. California Energy Commission, *Proposed Express Terms*, Title 20, CCR (TN #269617).
2. California Energy Commission, *Initial Statement of Reasons (ISOR)*, Replacement Tire Efficiency Program Rulemaking (TN #269619).
3. California Energy Commission / Smithers MSE Inc., *Summary of Tire Testing: Phase 1* (TN #269614).
4. California Energy Commission / Smithers MSE Inc., *Summary of Tire Testing: Phase 2* (TN #269613).
5. Kelley Blue Book. (2024, September 20). *Report: 19% of New Cars Are Hybrid or Electric.*
6. Tire Rack. (2026). *What Are The Uniform Tire Quality Grade (UTQG) Standards?*
7. ASTM International. (2021). *ASTM F414-21, Standard Test Method for Energy Absorbed by a Tire When Deformed by Slow-Moving Plunger.*