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*Comment Received From: Rodger Nelson
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The free market is the solution

To the California Energy Commission,

I am writing to express my strong opposition to the proposed tire efficiency rulemaking currently under consideration. As a consumer, California resident, automotive enthusiast, former tire industry retail worker, and holder of an engineering degree, I find this regulatory overreach entirely unnecessary. The free market already allows consumers to optimize the overall performance, safety, and cost of their vehicles. Artificially restricting tire availability will harm consumers and fail to account for critical, real-world vehicle use cases. I urge the Commission to review the following four distinct technical conflicts within my own household that demonstrate why this proposed rule is fundamentally flawed:

1. High-Performance and Track Use Cases (2016 Dodge Charger SRT392)

The factory-equipped Pirelli PZero tires on this vehicle were replaced with Michelin Pilot Sport 4S (PS4S) tires for street use because they offer vastly superior traction and braking performance. Furthermore, for closed-course racetrack use, this vehicle utilizes a 220-treadwear Goodyear Eagle F1 Supercar 3 tire. This tire is engineered specifically for maximum thermal stability and grip during max-effort track laps, where fuel economy is irrelevant. If the CEC restricts tires based strictly on rolling resistance parameters, you risk banning or severely limiting the exact high-performance compounds necessary for safe track operation and specialized vehicle performance.

2. Off-Road Utility and Aftermarket Modifications (2022 Ford Bronco)

This vehicle features a suspension lift and aftermarket off-road tires designed for severe terrain, rock crawling, and durability. Consumers who buy utility vehicles willingly accept lower fuel economy in exchange for off-road capability. Forcing low-rolling-resistance metrics onto light-truck and off-road tire categories will compromise the structural integrity, puncture resistance, and tread design required for off-road safety.

3. Vintage and Resto-Mod Applications (1965 Ford Mustang)

This heavily modified vintage vehicle utilizes modern radial tire technology that vastly improves stopping distances and handling over 1960s bias-ply technology. The rulemaking document fails to adequately clarify how vintage, classic, or heavily modified vehicles will be impacted. Restricting modern tire choices for classic cars will degrade the safety of these vehicles on public roads.

4. Severe Weather and Student Safety (2014 VW Beetle)

This vehicle was recently outfitted with Michelin CrossClimate tires because the driver is attending college in Idaho and requires severe snow and cold-weather performance. In this scenario, my daughter's physical safety in freezing conditions is infinitely more

important than a minor fractional increase in fuel economy. If your rulemaking penalizes all-weather or winter-rated tires due to their inherently higher rolling resistance, you are actively forcing California parents to compromise their children's safety when traveling out of state.

In conclusion, No bureaucrat or state commission can accurately weigh the hundreds of shifting variables—safety, treadwear, cost, weather, and utility—that an individual consumer evaluates when purchasing tires. I am entirely capable of making my own informed consumer choices. This proposed regulation represents an intrusive over-regulation that makes living in California increasingly frustrating, and it serves as a primary reason my family is hesitant to commit to staying in this state long-term. The best course of action the Commission can take is to halt this rulemaking and leave these choices to the free market and individual consumers.

Sincerely,
Rodger Nelson
San Pedro, CA