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*Comment Received From: Jason Smith  
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## **Tire efficiency program misguided**

I am as interested as anyone in improving the cleanliness and efficiency of our transportation. Eight years ago I stretched my budget very thin in order to switch to an electric vehicle. The biggest reason was to lower my carbon footprint and gain efficiency. However my electric car came with tires that were designed for minimal rolling resistance at the cost of all else. Those tires lasted less than 25k miles. At the end of their life I opted for a different style of tire that lowered the cars efficiency. The trade off for that lower efficiency was significant. The aftermarket tires perform much better from a traction and therefore safety standpoint. This is a very important consideration. The stock tires may have had adequate traction for daily driving in a city. But I drive in snow, on ice, and on very curvy back roads and highways regularly. More important that traction though has been tire life. That first set of original equipment tires as I have stated only made it 25k miles and I don't mean they were at the end of life. I mean slick, showing steel, dangerous at 25k miles. My current tires are now at over 60k miles. They still have significant life left in them even at that age. To top that off they were CHEAPER than the direct replacement own tires and made by the same brand. I have seen claims that studies have concluded that rolling resistance is not linked to tire life. Well frankly I challenge those findings. I believe that if those studies were conducted legitimately the results are being cherry-picked and used to mislead the public in support of this proposed rule. I am not here to try to stop progress and green initiatives however. I recognize that I am more aware than many consumers would be about the pros and cons and what those trade offs while mean for the performance and efficiency of my vehicle when selecting new tires. Therefore I would suggest that rather than regulating our choices as consumers that a better alternative would be to institute mandatory disclosures and notifications for the consumer that a given tire will increase their vehicle's rolling resistance and thereby reduce efficiency. An informed consumer can make a better choice on whether they really want to opt for a tire that will impact their economy. This would also be cheaper to institute and could cover more than just yes or no to a different tire option but show a range of options from maximum efficiency to maximum traction or tire life. These ratings already exist and are readily available. Let's mandated tire shops talk about them and inform their customers rather than limit people's options.

Thank you,  
Jason Smith