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Tire standards based on OEM tires is a bad idea

Limiting availability of tires to those that meet efficiency standards based upon new car OEM tires is a bad idea for a number of reasons.

1) Tire rolling efficiency measures one function of tires - rolling along a paved road. Tires have many other functions, such as keeping a vehicle on the road while going around curves or avoiding obstacles, stopping the car, preventing hydroplaning on wet roads, traction and control in wet, icy or snowy conditions, and driving on dirt and gravel roads. For many users, one or more of these functions is more important (and possibly life saving) than rolling efficiency. Putting rolling efficiency as not just the primary but only criteria for tires is ill advised, divorced from reality, and potentially life threatening.

2) Using OEM tires as the standard to measure against is arbitrary, and does not provide a good or consistent standard. While car manufacturers are incentivized to use efficient tires, they are also incentivized to use low cost tires, or even undersized tires. Some manufacturers use tires with less tread depth than standard replacement tires. Basing a regulatory standard based on decisions made by Ford or Hyundai or BMW essentially outsources the development of the efficiency standard to private industry, whose criteria for selecting tires likely differs from the policies of the State of California.

3) I understand that the proposed standard came from legislation, and accordingly is now state law. It is still a really bad idea, and the CEC should do all that it can to either get the law changed or at a minimum mitigate the potential harm that the proposed standard could cause.

Thank you.