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CALIFORNIA ENERGY COMMISSION

In the matter of:

Replacement Tire Efficiency)
Program Proceeding) Docket No. 26-TIRE-01
_____)

PUBLIC HEARING ON NOTICE OF PROPOSED ACTION:
REPLACEMENT TIRE EFFICIENCY PROGRAM RULEMAKING

REMOTE VIA ZOOM

WEDNESDAY, JUNE 10, 2025

10:00 A.M.

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P R O C E E D I N G S

10:05 a.m.

WEDNESDAY, JUNE 10, 2026

MR. RIDER: Well, good morning everyone. Thank you for joining today's public hearing on the California Energy Commission's Proposed Replacement Tire Efficiency Program. My name is Ken Rider and I'm a senior advisor to Chair Hochschild and technical lead for this rulemaking.

Next slide, please.

A few housekeeping items before we begin. First, this hearing is being recorded on Zoom. Second, the presentation materials and related documents are available through the Energy Commission's tire page -- Program page, the events page for today's hearing, and the rulemaking docket. Third, the purpose of today's hearing is to explain the proposal and receive comments. We will use the comments we receive today along with those provided in written comment to assess our proposal and consider revisions.

Due to time constraints, we are not able to respond to substantive questions live during today's hearing. However, we are always happy to meet with stakeholders or answer questions. You can reach out to tires -- T-I-R-E-S -- at energy.ca.gov to engage directly with our team. Please note that we are accepting public

1 comments through June 16th at 5 p.m. Pacific Time. This
2 timeline has been extended in light of technical issues
3 with our docketing system, and we apologize for any
4 inconvenience.

5 Next slide, please.

6 Here's the agenda for today I will start with
7 background, what tire efficiency is, why it matters, and
8 why the legislature directed the Energy Commission to act.
9 Then I will walk through the proposed regulation. After
10 that, I will summarize the key staff findings on cost,
11 safety, and tread wear and I will close with next steps in
12 the rulemaking process and then we will open the floor for
13 public comment.

14 Next slide, please.

15 Let me first start with some important background
16 information on tire efficiency and the history of this
17 proceeding.

18 Next slide, please.

19 The Energy Commission's proposed regulation
20 primarily addresses tire efficiency, which is measured by a
21 term called rolling resistance. As a tire rolls it flexes,
22 deforms, and smashes where it meets the road, and then
23 reforms its shape as it leaves the road. That process
24 generates heat using some of the energy that would
25 otherwise keep the vehicle in motion. That energy loss is

1 caused by what is called rolling resistance. Lower rolling
2 resistance tires often come standard on new vehicles since
3 they help automakers achieve better fuel economy and range.
4 The tires that come with the vehicle eventually wear out
5 and need replacement. While there are replacement tires
6 that are low rolling resistance, the fact is that on
7 average replacement tires are much less efficient than
8 original equipment tires.

9 When drivers replace their tires, they are
10 currently likely to lose some of the efficiency and range
11 that was built into their vehicle. That efficiency gap
12 creates a significant and hidden fuel cost for California
13 drivers of \$1 billion a year.

14 Next slide, please.

15 In light of this issue, the legislature has
16 directed the Energy Commission to close this gap by setting
17 minimum performance standards and increasing consumer
18 information. The Replacement Tire Efficiency Program is
19 codified in public resources code sections 25770 through
20 25773. The core statutory directive is to ensure that
21 replacement tires sold in California are, on average, at
22 least as efficient as original equipment tires sold on new
23 passenger cars and light duty trucks.

24 The law also sets important limits. Any minimum
25 efficiency standards must be technically feasible and cost

1 effective. They must not adversely affect tire safety,
2 they must not adversely affect tire life, and they must not
3 adversely affect state efforts to manage scrap tires. The
4 proposed regulations we will discuss today are carefully
5 designed to meet all of these statutory requirements.

6 Next slide, please.

7 Today's proposal is the result of an extensive
8 public process with industry and other interested
9 stakeholders. This process was initiated in 2020 when the
10 Energy Commission established the proceeding. In 2021,
11 staff published a request for information and held an
12 initial workshop to gather data and seek input on program
13 design, and in 2022, we partnered with an independent tire
14 testing laboratory, Smithers, to conduct an extensive tire
15 testing program. This testing was conducted in two phases,
16 with the first phase of testing conducted in 2022 and the
17 second phase the following year.

18 In 2023, the Energy Commission released a draft
19 framework and held another public workshop. The Energy
20 Commission spent the next two years engaging stakeholders,
21 gathering information, and reforming that framework and
22 related analyses, leading ultimately to the supporting
23 documents and proposed regulations currently under
24 consideration. The formal rulemaking process is another
25 great opportunity for stakeholders to provide feedback

1 through the review of the express terms, updated staff
2 report, and other key documents.

3 Next slide, please.

4 Before we get into the proposal let me just say
5 this. The replacement tire market is large and complex,
6 and any successful regulation in this space requires
7 careful design. That is why over the last five years, we
8 have facilitated an inclusive, data-driven stakeholder
9 process. We are grateful to every manufacturer, retailer,
10 trade association, advocate, and consumer that has
11 contributed to this proposal, and we are committed to
12 improving the proposal further with your feedback today.

13 With your help we are committed to advancing a
14 regulation that, one, achieves strong fuel savings with
15 minimal costs; two, ensures a robust, diverse supply of
16 tires and meets drivers' expectations on safety, treadwear,
17 and other purchasing criteria; and three, provides a level
18 playing field for manufacturers and retailers.

19 Next slide, please.

20 With that, let's dive into the proposed
21 regulations. I will go over the regulation at a high level
22 but encourage participants to read the language in full in
23 the express terms document.

24 Next slide, please.

25 The proposed regulations would have significant

1 economic, energy, and environmental benefits. The figures
2 on this slide represent a single year of benefits in the
3 year 2035, when we estimate the regulation will be fully in
4 effect. These benefits primarily come from the significant
5 reduction in fuel consumption from improved tire
6 efficiency. The proposal is estimated to reduce gasoline
7 demand by about 141 million gallons per year. It is also
8 estimated to reduce electricity demand by almost one
9 terawatt hour per year as the vehicle fleet continues to
10 electrify. The lower fuel consumption creates impressive
11 consumer savings, roughly \$1 billion in annual fuel cost
12 savings. Lastly, the proposal is estimated to reduce
13 greenhouse gas emissions by 2 million metric tons of carbon
14 dioxide equivalent in 2035. That is roughly comparable to
15 taking more than 400,000 internal combustion vehicles off
16 the road each year. The program also reduces criteria
17 pollutants that contribute to asthma, cancer, heart
18 disease, and other health conditions.

19 Next slide, please.

20 The benefits of this regulation are also
21 significant at the individual level. For a driver of a
22 passenger gasoline vehicle, staff estimates savings of
23 about \$85 over the life of a set of tires in Phase 1 and
24 about \$179 in Phase II. The estimated added tire cost is
25 much smaller, about \$6 per set in Phase 1 and about \$26 per

1 set in Phase II for passenger car tires. That means the
2 net savings are about \$79 per set in Phase 1 and about \$153
3 per set in Phase II. In both phases, the payback period is
4 short, only several months.

5 Please note that these estimates use a gasoline
6 price of \$4.60 per gallon. Today, gasoline prices are much
7 higher, and at these prices, the savings could be 25
8 percent higher than estimated here.

9 Next slide, please.

10 The proposal applies to replacement tires and
11 limited production tires manufactured on or after January
12 1, 2028 that are sold or offered for sale in California and
13 designed to replace tires on passenger cars or light duty
14 trucks. While limited production tires are within the
15 scope of the proposed regulation, proposed minimum
16 performance standards would not apply to them.

17 Several categories are excluded. These include
18 used tires, retreaded tires, deep tread tires, winter type
19 snow tires, space saver tires, and the remaining items on
20 the right side of this slide in red.

21 I'll pause a moment and let folks take a look.

22 Okay. Next slide, please.

23 For an in-scope replacement tire to be sold in
24 California, the regulation has three core requirements.
25 First, the tire must be listed in the Energy Commission

1 Tire Database by providing the required data to the Energy
2 Commission and using the specified test methods. Second,
3 the tire must comply with applicable maximum rolling
4 resistance standards. Third, the tire must comply with
5 minimum wet grip standards.

6 Next slide, please.

7 Manufacturers are responsible for designing tires
8 that meet the standards, testing their products, and
9 listing their products in the database. Retailers are
10 responsible for selling only tires approved for California
11 sale, unless a specific exemption applies. Lastly, the
12 Energy Commission is responsible for maintaining the
13 database, keeping the regulations up to date, and enforcing
14 standards. Once adopted, our commitment is to work
15 collaboratively with industry to monitor implementation and
16 ensure that the regulations are delivering value for
17 consumers and a stable level playing field for industry.
18 If serious unexpected issues arise, the Energy Commission
19 would work with industry to update the regulations to
20 resolve those issues.

21 Next slide, please.

22 The proposed rolling resistance standards are
23 designed to meet the legislated target to close the gap
24 between replacement tires and original equipment tires.
25 Laboratory testing by Smithers found that the average

1 replacement tire in the sample had a rolling resistance
2 coefficient of about 8.5, while the average original
3 equipment tire had a rolling resistance of about 7.1.
4 Remember that a lower rolling resistance means the tire is
5 more efficient.

6 Because the legislature directed the Energy
7 Commission to ensure that replacement tires are, on
8 average, at least as efficient as original equipment tires,
9 the Phase II default standard is set at 7.1.

10 Please also note that these are averages. Some
11 replacement tires already match or exceed the average
12 efficiency of original equipment tires, which supports the
13 technological feasibility of meeting these standards. This
14 will be more apparent in an upcoming chart.

15 On that note, this proposal is not designed to
16 require that replacement tires mimic every aspect of
17 original equipment tires. Original equipment tires are
18 designed to a vehicle manufacturer's specifications,
19 whereas replacement tires are designed to accommodate a
20 broader set of consumer preferences.

21 For this regulation, original equipment tires
22 were studied primarily to provide guidance on the
23 legislated efficiency target. The Energy Commission then
24 analyzed replacement tires to understand their various
25 abilities and utilities in comparison to their energy

1 efficiency to ensure that all categories of replacement
2 tires, including specialty, long life, ultra long life, and
3 ultra-high performance tires continue to be available to
4 California drivers.

5 Next slide, please.

6 Here's the Energy Commission's full set of
7 maximum rolling resistance requirements, including the
8 specific product categories I just mentioned. The proposal
9 uses a two-phased approach. Phase 1 begins in 2028 with a
10 less stringent standard to provide a transition period.
11 This is followed with Phase II, which begins in 2031 with a
12 standard that meets the legislated target. The default
13 rolling resistance coefficient standard is nine in Phase 1
14 and 7.1 in Phase II.

15 As noted, the proposal includes category-specific
16 standard levels for several tire categories. Low load
17 index tires are tires with a tire index of 91 or less.
18 Light truck tires are tires with an LT designation. Long
19 life tires and ultra-long life tires are tires with
20 enhanced wear capabilities as determined by the federal
21 wear test procedure. And lastly, ultra-high performance
22 tires are tires with a high speed rating and a high wet
23 grip performance. These category adjustments respond to
24 comments from manufacturers and are intended to preserve
25 the tire availability and performance attributes that

1 consumers value. If a tire qualifies for more than one
2 category, the most lenient applicable standard applies.

3 I also want to take a moment to address
4 enthusiasts who have an interest in ultra-high performance
5 tires. The Energy Commission created a separate target for
6 ultra-high performance tires as part of its commitment to
7 ensuring that enthusiasts continue to have access to these
8 products. Manufacturers can reach these targets and will
9 have significant time to improve these tires to do so.

10 Next slide, please.

11 The proposed regulation also includes a wet grip
12 standard. Wet grip measures a tire's relative braking
13 performance on a wet surface. It is expressed as a wet
14 grip braking performance index, which is relative to a
15 standardized tire. Higher values mean better wet braking
16 performance and shorter stopping distances. The proposed
17 minimum is 1.0, beginning in Phase 1 and continuing without
18 changes in Phase II. This standard applies to tires
19 subject to the rolling resistance standards.

20 As we will discuss later, there is no observed
21 relationship between tire efficiency and wet grip.
22 However, this provision provides further protection for
23 driver safety and would remove the least safe tires from
24 the California market. This was a suggestion adopted from
25 the US Tire Manufacturers Association and individual

1 manufacturers, and we thank them for their suggestion.

2 Next slide, please.

3 The statute also requires the Energy Commission
4 to develop a rating system that will enable consumers to
5 make more informed decisions when purchasing tires for
6 their vehicles. The proposal uses a simple tire efficiency
7 rating based on rolling resistance. The ratings are
8 aligned with the European Union rating system, which
9 reduces complexity for manufacturers operating in multiple
10 markets. The proposed rating system utilizes leaves to
11 indicate the efficiency level, where more leaves indicate a
12 more efficient tire. This information would be available
13 through the Energy Commission database and website.
14 Importantly, the proposal does not require retailers to
15 post new in-store language.

16 Next slide, please.

17 The Energy Commission takes enforcement very
18 seriously. We have an obligation to ensure a level playing
19 field for manufacturers and retailers. The enforcement
20 regime for Replacement Tire Efficiency Program would work
21 as follows.

22 First, manufacturers and brand name owners would
23 certify tire information to the Energy Commission database
24 under penalty of perjury. The Energy Commission can verify
25 those submissions through independent laboratory testing

1 and by requiring test reports and supporting documents.

2 Second, retailers may sell only compliant tires
3 listed in the Energy Commission database, unless a specific
4 exemption applies. The Energy Commission can verify
5 retailer compliance through online and physical market
6 surveillance.

7 Third, when non-compliance is identified, the
8 Energy Commission expects to use an escalating enforcement
9 approach that can include notices, formal determinations of
10 violation, and legal action where appropriate.

11 I want to emphasize that the Energy Commission
12 has extensive experience enforcing energy and water
13 efficiency standards for consumer products. We have a
14 dedicated team of 14 full-time staff who enforce efficiency
15 regulations for a variety of consumer products. This team
16 has the tools and experience to provide vigorous
17 enforcement for the Replacement Tire Efficiency Program.

18 Next slide, please.

19 Finally, I want to note that the proposal also
20 has provisions for two special circumstances. The first is
21 limited production tires. These are tires produced or
22 imported in the United States at fewer than 15,000 units
23 per year. They're not subject to the minimum performance
24 standards, but manufacturers must report them to the Energy
25 Commission database annually to verify their limited

1 production status. This will allow the Energy Commission
2 to carefully monitor usage of the exemption and ensure it
3 is only claimed by manufacturers where appropriate.

4 The second is a vehicle-specific exemption. If
5 no compliant tire is available in sufficient quantities for
6 a specific vehicle fitment in California, a manufacturer or
7 brand owner may petition the Energy Commission for an
8 exemption. If approved, the exempt tire is listed in the
9 Energy Commission database and may be sold for that limited
10 purpose. We expect this to be rare and we are committed
11 to, again, to ensuring a robust, diverse supply of
12 replacement tires for all vehicles.

13 Next slide, please.

14 The statute requires the Energy Commission to
15 consider cost-effectiveness, technical feasibility, safety,
16 tire life, and scrap tire management. I'll now turn to the
17 key findings from staff's analysis.

18 Next slide, please.

19 The statute requires that the proposed
20 regulations be technically feasible. Staff find that the
21 proposed performance levels are technically feasible, not
22 only because there are technologies available today that
23 can improve tire efficiency, but also because they are
24 actively implemented in tires on the market. The Energy
25 Commission partnered with Smithers to measure the rolling

1 resistance of three types of tires, which are shown on the
2 chart on the slide.

3 The green dots show popular replacement tires in
4 California, blue dots show original equipment tires, and
5 the red dots show tires that were marketed specifically for
6 efficiency. The chart plots rolling resistance against
7 price. The average rolling resistance for each category is
8 shown as a line. There are many replacement tires on this
9 chart that already meet Phase I and II standards. As
10 stated earlier, the Phase I default standard is a rolling
11 resistance of nine or less. As you can observe from this
12 graph, most tires that we tested would meet this level of
13 performance, even without product category considerations.

14 Similarly, you can see that many popular
15 replacement tires would already meet Phase II standard of
16 7.1. That level can be seen on this chart as the blue line
17 representing the average rolling resistance of original
18 equipment tires. Even more replacement tires meet Phase II
19 when factoring in the less stringent targets for long life
20 tires, ultra long life tires, and other product categories.

21 Let me stress this point again. There is a
22 significant number of popular replacement tires that
23 already meet both Phase I and Phase II standards. They are
24 safe, long-lasting, and competitively priced. They're made
25 across a variety of manufacturers for a variety of

1 different vehicle shapes and sizes. This demonstrates
2 clear technical feasibility.

3 The other aspect of the proposed regulation is
4 the timeline. The Energy Commission has provided
5 significant time before the regulations, particularly Phase
6 II, would come into effect. That is because we are not
7 expecting mere substitutions of one dot in this chart with
8 another. Rather, we are providing time for manufacturers
9 to improve their products, leading to a significant
10 increase in the number of compliant tires that are on the
11 market before the more stringent standards take effect.

12 Next slide, please.

13 Staff have also analyzed the cost effectiveness
14 of the proposal and have concluded that the proposed
15 standards are very cost effective. Staff find that the
16 proposed standards would likely have a minimal increase in
17 the cost of tires that are offset by much larger fuel
18 savings, where consumers have made their costs back in
19 approximately seven months.

20 Staff studied incremental costs in two ways.
21 First, the Energy Commission studied federal cost estimates
22 from US EPA and NHTSA. These agencies have long evaluated
23 low rolling resistance tires as one of the technologies
24 that automakers can use to comply with federal fuel economy
25 and greenhouse gas standards. In those rulemakings, the

1 agencies estimate the cost and effectiveness of low rolling
2 resistance tires. Their estimates look at a 10 percent and
3 20 percent improvement to rolling resistance, whereas our
4 Phase I and Phase II standards fought lower percentages of
5 improvement. Thus a cost curve was developed to utilize
6 their data. This curve can be seen on the chart on the
7 left, as well as where the proposed standards fall on the
8 curve. These estimates from US EPA and NHTSA support
9 incremental cost estimates of about \$1.50 per tire in Phase
10 I and \$6.50 per tire in Phase II for passenger car tires.

11 Second, the Energy Commission used the Smithers
12 data set to consider the relationship between retail tire
13 price and rolling resistance. This is shown by the chart
14 on the right. As you can see by the shape of the data
15 points, there is no significant relationship between price
16 and rolling resistance. If there were a strong
17 relationship between price and rolling resistance, one
18 would expect the data to have a downward slope when moving
19 towards the right of the x-axis. Instead, the data does
20 not have any clear statistical pattern, and efficient tires
21 are already available across a range of prices. Together,
22 these two analyses validate that more efficient tires can
23 be produced with minimal cost to consumers, and that any
24 cost will be rapidly exceeded by fuel savings.

25 Next slide, please.

1 Staff analyzed the gathered data to see if there
2 is a relationship between rolling resistance and tire
3 lifespan for several reasons. First, it's an important
4 quality of tires to consumers. Tire lifespan is also a key
5 driver of tire waste and purchases. One of the
6 characteristics the Energy Commission focused on was
7 treadwear ratings, as they are frequently used as a
8 predictor for lifespan. While the proposition of trading
9 treadwear for rolling resistance has been raised by some
10 stakeholders, staff have found that that is not a common
11 practice in the replacement market. Further, replacement
12 tires have been shown to have both low rolling resistance
13 and good treadwear, meaning that a tradeoff is not
14 required. In fact, some of the longest-lasting tires we
15 tested have better than average rolling resistance.

16 Staff examined many factors to tire wear, two of
17 which are represented here on the slide. First, on the
18 left the Energy Commission compared the rolling resistance
19 with the Uniform Tire Quality Grading, or UTQG, treadwear.
20 The chart plots Smithers Rolling Resistance Test results
21 against federally required treadwear disclosures. Again,
22 the lower the rolling resistance, the more efficient a tire
23 is. For treadwear, the higher the treadwear rating, the
24 longer the theoretical life of the tire will be.

25 To evaluate a potential trend between rolling

1 resistance and treadwear, a statistical linear regression
2 was performed. That generates a line that best fits the
3 data and a coefficient of determination, also called an
4 R-squared value. An R-squared value of one indicates that
5 one variable is a very strong predictor of the other, and a
6 value of zero indicates that there is not a trend or
7 relationship. Statistical analysis of the data yields a
8 very low, almost zero R-squared value, which means that
9 there is not a significant relationship between these two
10 variables.

11 When this data was presented in the original
12 draft framework in 2023, tire manufacturers and other
13 industry members expressed low confidence that the federal
14 treadwear disclosures would provide a meaningful
15 comparison, particularly across manufacturers. They
16 instead pointed to what they viewed as industry
17 best-in-class data on tire wear, Discount Tire's Treadwell
18 Database.

19 Discount Tire tracks real-world service records
20 of wear on specific tires, generating an estimate in miles.
21 Discount Tire generously agreed to share this information
22 for many of the tires Smithers tested for rolling
23 resistance.

24 The chart is a representation of that data, with
25 the Treadwell mileage estimate on the x-axis, where a

1 higher number represents a longer tread life, and the
2 Smithers measured rolling resistance on the y-axis. Again,
3 the statistical analysis shows no significant relationship
4 between rolling resistance and treadwear. The R-squared
5 value is nearly zero, which indicates no statistical
6 relationship between rolling resistance and Treadwell
7 mileage.

8 The data gathered by the Energy Commission
9 provides clear evidence that replacement tires can achieve
10 low rolling resistance without adverse impacts to
11 treadwear. This is shown both by the lack of a statistical
12 relationship and by the products available today with both
13 good wear and good rolling resistance characteristics.

14 Next slide, please.

15 While the data does not indicate any relationship
16 between efficiency and treadwear, we have designed the
17 regulation to reflect the value of additional wear.
18 Specifically, the rolling resistance standards are less
19 stringent for long-life tires and ultra-long-life tires.
20 That means a tire with longer expected life receives a
21 compliance benefit.

22 The table on the slide reflects adders that these
23 categories achieve. For example, in Phase II, an ultra-
24 long-life tire will not be held to the default standard
25 rolling resistance of 7.1, but rather a rolling resistance

1 of 8.5. Eligibility for these categories are based upon
2 the federal test procedure for UTQG treadwear, where a
3 long-life tire is determined as a direct test score above
4 1000 and an ultra-long life is defined as a score above
5 1400. For a variety of reasons, manufacturers often report
6 lower UTQG scores than the direct value from the test
7 procedure, which is why scores at these levels are not seen
8 in the graph on the previous slide.

9 This structure means that increasing treadwear
10 and lifespan provides a compliance benefit, whereas
11 decreasing treadwear and lifespan will make compliance more
12 difficult. The previous slide demonstrates that
13 technologies are available that do not require trading
14 treadwear for efficiency, and this additional measure
15 further promotes those technological pathways.

16 Next slide, please.

17 The third finding is that the data does not show
18 adverse safety impacts for more efficient tires.

19 Smithers tested new tires for rolling resistance
20 and wet grip. The resulting data is shown on the graph on
21 the left of the slide. The higher the wet grip index, the
22 better the stopping distance in wet road conditions. The
23 testing did not show a significant relationship between
24 rolling resistance and wet grip index for these new tires.
25 However, the Energy Commission did test several tires that

1 had particularly poor wet grip below the 1.0 standard that
2 would fail to meet the proposed minimum wet grip threshold.
3 These would no longer be eligible for sale in California.

4 Thanks once again to the partnership with
5 Discount Tire and their Treadwell data, the Energy
6 Commission was also able to examine the wet stopping
7 distance of worn tires to further understand if safety
8 would be affected in low rolling resistance tires further
9 into their usage. This data is shown on the chart to the
10 right of the slide. The x-axis shows the wet stopping
11 distance. The shorter, the better for safety.

12 For worn tires, the Energy Commission again did
13 not find any relationship between efficiency and the worn
14 wet stopping distance of worn tires. The data shows that
15 lower rolling resistance does not adversely affect safety.

16 Next slide, please.

17 The regulatory design also creates additional
18 safety incentives. First, as stated, every replacement
19 tire must meet the minimum wet grip index. That removes
20 tires with inadequate wet braking performance from the
21 market. Second, we provide additional flexibility for
22 ultra-high performance tires, which are tires with
23 exceptional wet grip performance. Under this proposal, an
24 ultra-high performance tire must have a W or Y speed rating
25 and a wet grip index of at least 1.45. These tires would

1 be held to a Phase II rolling resistance standard of 8.5
2 instead of the default of 7.1. In other words, we
3 structured the regulations such that increasing wet grip
4 provides a compliance benefit, whereas decreasing wet grip
5 will make compliance more difficult for tires with high
6 speed ratings. This is an additional measure to promote
7 safer tires for drivers.

8 Next slide, please.

9 Finally, I'd like to discuss where this proposal
10 relates to the European Union approach to replacement tires
11 and where it does not. The European Union has been a
12 leader on consumer information for tires and it has a
13 robust rating system for efficiency and other
14 characteristics. The Energy Commission's proposed
15 regulation significantly harmonizes with the EU or the
16 European Union on test procedures and product rating
17 categories to reduce industry burden. However, staff want
18 to emphasize that this proposal is not based on European
19 passenger tire performance, nor is it intended to make
20 California resemble the European market.

21 The European tire markets differ from the US
22 market in many ways. In many European countries, drivers
23 commonly switch between dedicated summer and winter tires
24 and tire performance is optimized for those seasonal uses.
25 By contrast, the US replacement market is dominated by

1 all-season tires, designed to provide acceptable
2 performance across a wide range of weather conditions and
3 to remain on the vehicle year round. The proposed
4 regulation has been developed entirely within the context
5 of California and the US replacement tire market. Staff
6 analyzed commonly selected replacement tires used on
7 popular California vehicles and determined that improved
8 rolling resistance can be achieved in a cost effective
9 manner without adversely impacting safety or tread wear of
10 those tires. No European market tires were included in
11 that analysis.

12 We welcome additional feedback. As we stated
13 before, we are committed to ensuring a robust supply of
14 replacement tires that meet the expectations of California
15 consumers on cost, tread wear, safety, and other key
16 criteria.

17 Next slide, please.

18 I'll now close with next steps in the rulemaking
19 process.

20 Next slide.

21 Staff will review the oral comments received
22 today and written comments submitted during the comment
23 period, which again has been extended to June 16th. Based
24 on these comments, the Energy Commission staff will
25 determine whether changes to the proposed regulations are

1 appropriate. If changes are made, the Energy Commission
2 will release the amended language and provide an additional
3 15-day opportunity for written comment, typically focused
4 on the changes. If you'd like to be notified when such
5 opportunities open, please sign up to be notified on the
6 proceeding website.

7 When the proposed regulation is ready for the
8 Commission's consideration, it will be placed on an Energy
9 Commission business meeting agenda. At that meeting, there
10 will be another opportunity for public comment before any
11 vote to adopt the proposed regulation.

12 On behalf of the Energy Commission, I want to
13 thank you all for participating in this proceeding. Your
14 feedback is very valuable to us and we take it seriously.

15 With that, we will move to the public comment
16 portion of this hearing. I will turn the microphone over
17 to Spencer Kelley.

18 MR. KELLEY: Good morning. Okay. I'm going to
19 start with -- let's see, lowering all the current
20 attendees' hands. Okay.

21 Good morning. We will now begin the public
22 comment portion of the hearing. You may raise your hand
23 now to form a queue for public comment. If you are on the
24 Zoom application, please use the raise hand feature on Zoom
25 to provide an oral comment. If you are on a telephone,

1 please dial star nine to raise your hand and star six to
2 unmute yourself.

3 Please note that due to time constraints, time
4 will be limited to three minutes per commenter, with a
5 limit of one commenter per organization. I will ask you to
6 complete your comment at the three minute mark, and we will
7 move on from a commenter at the 3:30 mark. We will have a
8 stopwatch available to help commenters track their time.
9 Please state your name and affiliation for the record.

10 With that, we will move to the first public
11 comment. Okay.

12 The first speaker will be Cameron Rogers. I'm
13 unmuting you now. Please state your name and affiliation
14 for the record.

15 MR. ROGERS: Hi, this is Cameron. I'm an auto
16 enthusiast, and I also work with 350 Bay Area Environmental
17 Organization.

18 I just want to say to the Commission, thank you
19 for this work, as well as to my fellow auto enthusiasts. I
20 just completed a 25-hour race two weeks ago in Northern
21 California. I think there's a lot of fear, uncertainty,
22 and doubt around this regulation that we're going to lose
23 our high-performance tires, that safety is going to go
24 down, performance is going to go down, but let me assure
25 all my friends in the community that adding silica to your

1 tires is fine. It's a few dollars of cost that will easily
2 pay for itself, as staff has shown. So hopefully we can
3 move forward and save 400,000 cars worth of emissions for
4 what is a beneficial change.

5 If you doubt me, go look at what the Teslas can
6 do on a racetrack with their stock tires that have these
7 silica compounds applied, both their high performance
8 versions as well as their normal all-weather tires. They
9 work just great.

10 So again, Cameron from 350 Bay Area, auto
11 enthusiast, thank you for your work, California Energy
12 Commission.

13 MR. RIDER: Thank you for your comment, Cameron.

14 MR. KELLEY: All righty. Let's move to the next
15 speaker. The next speaker will be Karim D. Marshall.
16 Please state your name and affiliation for the record. I'm
17 going to mute you now.

18 MR. MARSHALL: Okay. Can you guys hear me?

19 MR. RIDER: Yes.

20 MR. MARSHALL: Okay. Good morning. My name is
21 Karim D. Marshall. I am the Director of Climate and Energy
22 Policy for the Consumer Federation of America. I am
23 speaking in support of the proposed action, the Replacement
24 Tire Efficiency Program rulemaking.

25 For background, the Consumer Federation of

1 America is an association of nonprofit consumer
2 organizations that was established in 1968 to advance the
3 interests of consumers through research, advocacy, and
4 education. Today, we have nearly 200 groups participating
5 in the federation. In the interest of time, I'll read an
6 abbreviated version of my comments and then enter the full
7 ones into the record.

8 I am here today on behalf of CFA and our member
9 organizations in support of the proposed action. As an
10 advocacy organization, CFA works to advance pro-consumer
11 policies on a variety of issues before Congress, the White
12 House, federal and state regulatory agencies, state
13 legislatures, and the courts. We communicate and work with
14 public officials to promote beneficial policies, oppose
15 harmful ones, and ensure a balanced debate on issues
16 important to consumers. In this case, we're acting to
17 support common sense, scientifically sound, and statutorily
18 required rulemaking to improve tire efficiency.

19 In 2003, the California Assembly passed Bill 844,
20 which directed the executive agencies to establish a
21 statewide Replacement Tire Efficiency Program. Following
22 years of study, stakeholder outreach, further study, and a
23 comprehensive and objective third-party evaluation of the
24 proposed standards, the CEC has issued these rules, and we
25 support them. Consumers have been waiting a long time for

1 these rules, and they need the savings that they will
2 bring. In an era of geopolitical instability and higher
3 gas prices, these savings are all the more important.

4 These rules are not optional. They are required
5 by law. More efficient tires result in a higher fuel
6 economy, which means consumers will have more time between
7 trips to the pump or to recharge. The Commission's savings
8 projections to individual consumers were based on a modest
9 \$4.60 per gallon price. This price is, of course, much
10 lower than the current California highest recorded average
11 of \$6.43 per gallon, according to AAA. This is, of course,
12 the average price. It doesn't reflect the significantly
13 higher price in urban centers such as Los Angeles, San
14 Diego, and the San Francisco Bay, where savings would be
15 even more remarkable.

16 High-efficiency tires are already on the market,
17 but today there's no good way for consumers to identify and
18 compare them. By establishing a rating system and public
19 database, CEC's tire program would help resolve this.

20 It is critical that consumers have a transparent
21 marketplace and clear standards. We all feel it. Today,
22 everything costs a little bit more than it did yesterday.
23 It breaks a little bit faster than it did for our parents,
24 and as goods become more complex, there's less that the
25 average consumer can do to maintain the life of their

1 products. This rule is a rare instance where not only the
2 environment will benefit, but consumers will get more out
3 of their purchases rather than less. These tire standards
4 will help consumers spend a little bit less on gas or
5 charging costs over the life of their next set of
6 replacement tires, and these days, every dollar counts.

7 Thank you for the opportunity to give voice to
8 the priorities of consumers.

9 MR. RIDER: Thank you very much for your comment.

10 MR. KELLEY: All righty. Let's move to the next
11 speaker.

12 The next speaker will be Dave Kusa. Please state
13 your name and affiliation for the record. I'm going to
14 unmute you now.

15 MR. KUSA: Hi. Good morning. My name is Dave
16 Kusa. I am -- excuse me -- currently the Chair for the
17 Government Affairs Committee for the Automotive Service
18 Councils of California, and I'm also a shop owner in the
19 state. I am an ASE certified L1 technician, service
20 advisor, shop owner with 42 years of experience, and over
21 those 42 years, I've seen many vehicles and systems on
22 vehicles that are California-only, and they have always
23 resulted in significantly higher costs to replacement
24 parts, to repair, and then also resulted in scarcity to
25 unavailability for those parts for California-only cars as

1 those cars age. Those cars are typically owned by working
2 Californians that don't necessarily have a lot of extra
3 money to pay for California-specific components.

4 The information that we have seen in the industry
5 is a little bit less rosy than was presented today, with
6 those tire costs being higher than anticipated and having
7 little to no offset in fuel costs, especially as fuel costs
8 come back down in the near future.

9 So my concern is, as a shop owner, as a business
10 owner, as a consumer supply chain, that my customers that
11 are already stretched thin by so much money being spent on
12 extra costs will not be able to easily afford the extra
13 costs, may delay those purchases with potentially unsafe
14 tires until they can save up enough money to pay for them.

15 So my ask is that -- you know, I fully support
16 clean air in California. I'm a brand-new grandfather and
17 want my grandson to have a great, clean environment as he
18 grows up into adulthood. But at the same time, we want to
19 make sure that we're not adversely affecting the cost to
20 the consumers and the drivers of California.

21 So potentially older cars as well. I am a proud
22 owner of a 71 Chevelle that has 14-inch tires on it. So
23 those vehicles are -- my concern is that tire manufacturers
24 just aren't going to service older vehicles with different-
25 sized tires that are significantly different than new cars

1 today, even cars that are, you know, 10 or 15 years old.
2 So 13-, 14-, 15-inch tires are a lot of cars out there. I
3 see them all the time. Will those tires be available? I'm
4 very concerned that they won't be, and will significantly
5 drive up the cost of tire replacement for those vehicles
6 and those consumers because it's going to be new rims as
7 well, and hopefully there's a rim and tire package that
8 would fit those cars. Otherwise, they're no longer usable.

9 And, again, this is, you know, working
10 Californians many times that drive these older vehicles.
11 We see them a lot as a participant in the Clean Air Rebate
12 program. A lot of older cars and a lot of people that just
13 plain old can't afford to fix their cars at the current
14 high prices that we are experiencing.

15 So perhaps more exemptions on some of the tire
16 sizes that won't be readily available, California-only, and
17 perhaps more of a delay in implementing these regulations
18 until manufacturers can catch up. Thank you.

19 MR. RIDER: Thank you for your comment, Dave.

20 MR. KELLEY: All right. Let's move on to the
21 next speaker.

22 The next speaker will be Russell Shepherd.
23 Please state your name and affiliation. I'm going to
24 unmute you now.

25 (Pause)

1 We cannot hear you, Russell.

2 MR. SHEPHERD: Can you hear me now?

3 MR. RIDER: Yeah.

4 MR. KELLEY: Yes.

5 MR. SHEPHERD: Thank you. Sorry about that.

6 Good morning. I am Russell Shepherd, Director of
7 Technical Communications for Michelin North America. On
8 behalf of Michelin, I would like to thank the California
9 Energy Commission for the opportunity to comment on
10 proposed Replacement Tire Efficiency Program rulemakings.

11 Since its founding, Michelin has always upheld
12 freedom of movement as a fundamental right and a source of
13 human progress. Among the company's core convictions is
14 the belief that technological progress is key to addressing
15 environmental challenges. Technological progress enables
16 Michelin to continually build on the principle of a
17 circular economy, carbon reduction, resource conservation,
18 and biodiversity. In this context, Michelin has been
19 committed for many decades -- many decades -- to improving
20 the rolling resistance of its products. In fact, from 1992
21 to 2025, Michelin has reduced the rolling resistance of its
22 tires by half.

23 Furthermore, through continued research and
24 development, Michelin aims to improve that performance by 1
25 percent per year through 2030. Michelin has products on

1 the market today that meet or exceed California's proposed
2 thresholds while delivering outstanding wear life and other
3 performances. Michelin is particularly encouraged by
4 California's emphasis on total tire performance, which
5 aligns with our all-sustainable ambitions to reduce tire
6 impact at every stage of the lifecycle while meeting
7 consumers' expectations for value. Improvements in rolling
8 resistance must be balanced with essential safety
9 performances such as wet traction, as well as other
10 environmental factors such as wear life and durability.

11 Michelin truly believes that tires should be both
12 safe and efficient from the first mile of use to the very
13 last, which is all the way to the legal wear limit of the
14 tire. Thank you for your time and consideration.

15 MR. RIDER: Thank you for your comment, Russell.

16 MR. KELLEY: All righty. Let's move to the next
17 speaker.

18 The next speaker will be Alexis Sutterman.
19 Please state your name and affiliation for the record. I'm
20 unmuting you now.

21 MS. SUTTERMAN: Great. Thank you so much.

22 Good after -- or good morning, still. My name is
23 Alexis Sutterman, and I'm speaking today on behalf of
24 Brightline Defense. We are an environmental justice
25 organization that serves communities who are

1 disproportionately burdened by multiple sources of
2 pollution, including busy highways and congested corridors.
3 And on top of these burdens, many of these communities also
4 do not have air filtration or modern HVAC systems in their
5 own buildings. Many of them are in single-room occupancy
6 buildings in San Francisco, Chinatown, and other areas that
7 do not have these modern systems, which makes this
8 regulation extremely important.

9 And we're here to voice our strong support for
10 the Proposed Replacement Tire Efficiency standards as
11 representing a major win on two key issues, both on
12 affordability and public health.

13 First, seeing the standard as, you know, a direct
14 investment in the pockets of these working-class
15 communities that we serve. You know, conservative
16 estimates showing that drivers will save between \$179 and
17 \$246 over the lifetime of a set of tires, leading to nearly
18 \$1 billion in statewide savings annually by 2035, and also
19 noting these calculations were based on, you know,
20 historical fuel costs, and now with gas prices surging even
21 higher, knowing that the real-world savings for families
22 will be even higher than this.

23 So at a time when, you know, cost of living is
24 really squeezing the pockets of working-class households,
25 this standard is going to deliver much-needed economic

1 relief.

2 And in addition to that, as kind of mentioned at
3 the top of the comment, you know, the environmental and
4 public health benefits of this rule are extremely
5 important. Brightline works directly in frontline
6 communities who are, again, grappling with the health
7 impacts of multiple sources of pollution. And, you know,
8 through our work on CARB's AB617 Air Quality Monitoring
9 Program, we've worked directly with frontline communities
10 who are heavily burdened by transportation emissions and
11 face a number of vulnerabilities because of that.

12 So we're really enthused by the fact that by
13 2035, these newer standards will reduce annual greenhouse
14 gas emissions by 2 million metric tons, the equivalent of
15 taking 400,000 gasoline vehicles entirely off the roads.
16 And just as importantly, you know, reducing 430 tons of
17 smog-forming nitrous oxide and 20 tons of lung-damaging
18 particulate matter 2.5 yearly.

19 So, you know, these figures represent huge
20 improvements in everyday people's lives, meaning less, you
21 know, reduced asthma attacks, cleaner air, and real
22 progress on our climate goals.

23 So we strongly urge the Commission to adopt these
24 standards and really thank you for your leadership on this
25 issue.

1 MR. RIDER: Thank you for your comment, Alexis.

2 MR. KELLEY: All righty. Let's move on to the
3 next speaker.

4 The next speaker will be Dick Albright. Please
5 state your name and affiliation. I'm unmuting you now.

6 (Pause)

7 We're not hearing you, Dick.

8 (Pause)

9 All righty. We'll move on to the next speaker.
10 Please feel free to raise your hand again and we'll try
11 again here.

12 Okay. The next speaker will be Genso. Please
13 state your name and affiliation. I'm unmuting you now.

14 MR. ERLENDSSON: Thank you for taking the call.
15 I trust you can hear me.

16 MR. RIDER: We can. My name is Gunnlaugur
17 Erlendsson, CEO of Enso. We are an EV-focused tire company
18 and a Nordschleife Prize finalist (phonetic). Our
19 executive team brings over 100 years of combined senior
20 experience from companies such as Goodyear, Continental,
21 and Pirelli.

22 I'm calling to follow up on our support letter
23 that we filed with the CEC to support the proposed
24 Replacement Tire Efficiency Program, and I want to briefly
25 explain why we are supporting it directly from the

1 perspective of a company that is already selling these
2 tires today. There are four reasons.

3 One, the CEC cost estimates are reasonable and
4 these rules will not raise ultimate prices for California
5 customers. Enso already sells high-performance,
6 low-rolling resistance tires at prices competitive with and
7 often below the incumbent brands. If a small, independent
8 tire company can deliver this profitably to the market, the
9 world's largest tire makers can definitely do the same.

10 The second, the historical performance trade-offs
11 have actually been solved. These kinds of tires already
12 exist in mature markets such as the EU, the UK, Japan,
13 China, and South Korea. They all have tires that meet
14 these standards, and have had them actually for over a
15 decade. California customers will simply now be giving
16 access to these technologies that the rest of the world
17 already has.

18 Third, improved rolling resistance does not
19 compromise safety or tread wear. The Commission's own
20 testing shows that rolling resistance and wet grip are
21 statistically independent. Our AA-rated European tires
22 already carry over 7 millimeters of tread depth, one of the
23 deepest in this class that we know of, and a high UTG rate,
24 which is mainstream for the U.S. aftermarket.

25 Fourth, efficient tires matter even more for EVs.

1 California has about 40 percent of U.S. EV registrations
2 and a high density of EV market. We already partnered with
3 Uber where we're giving EV drivers access to our products,
4 and we're expanding that partnership into the U.S. later
5 this year.

6 What we really want to also highlight is our
7 additional suggestions from our letter. We really
8 encourage the Commission to authorize but not require a
9 voluntary efficient tire label that manufacturers such as
10 ourselves can choose to display, similar to the EU, Japan,
11 and South Korea regulations. It imposes no mandatory cost
12 to the industry, and it rewards the companies who have
13 really invested in improving energy efficiency and show
14 what they can do directly to the consumers.

15 We're committed to working with the California
16 Energy Commission, and we welcome the chance to share real
17 world rolling resistance results, wet grip improvements,
18 and EV durability data. We are open to discuss anything
19 with your staff. We're happy to make this happen.

20 And ultimately, this really matters because
21 households that are most excited -- lower income drivers,
22 rural drivers, and those traveling long distances -- will
23 benefit the most from a rule such as this that lowers the
24 per mile costs over the lifetime of the tire.

25 Thank you so much.

1 MR. RIDER: Thank you for your comment, G.

2 MR. KELLEY: All righty. Let's move on to the
3 next speaker.

4 The next speaker will be Bill Magavern. Please
5 state your name and affiliation for the record. I'm
6 unmuting you now.

7 MR. MAGAVERN: Good morning. This is Bill
8 Magavern. I'm Policy Director with the Coalition for Clean
9 Air, speaking in support of the proposed rule, and I thank
10 Ken Rider and the rest of the CEC team for bringing this
11 forward.

12 It was 23 years ago that I wrote a support letter
13 for Assembly Bill 844, which passed into law, and gave the
14 CEC the responsibility of setting these standards. So this
15 day has been a long time coming, and I appreciate the hard
16 work of those that have revived this measure.

17 We need to reduce the harmful emissions that come
18 from transportation. California has by far the worst air
19 quality in the nation. We have both the worst smog and the
20 worst soot, and this rule will reduce both of those, and at
21 a time when the federal government is obstructing
22 California's efforts to clean up our air, we cannot afford
23 to pass up an opportunity to reduce those harmful
24 emissions.

25 At the same time, the proposed rule will save

1 money. And we know that drivers right now are hard-pressed
2 by fuel costs, so we cannot leave these fuel savings on the
3 table, and again, the federal government is obstructing
4 ways to make cars more efficient and save our drivers
5 money.

6 So this is a measure that California can adopt on
7 its own. It does not require the approval of the federal
8 government. And I think, in fact, other states may well
9 follow California's lead, as they often have when it comes
10 to cleaning up transportation, so we can have an impact
11 even beyond our borders.

12 Whether drivers are using gasoline cars or
13 electric vehicles, they will save money by having more
14 efficient tires. So I'm glad that we've gotten to this
15 point today, but we need to keep the momentum going and
16 make sure that the Commission adopts this rule no later
17 than this year, so that we can get these important
18 reductions in emissions and these savings in fuel costs.

19 Thank you very much.

20 MR. RIDER: Thank you for your comment, Bill.

21 MR. KELLEY: All righty. Let's move on to the
22 next speaker.

23 The next speaker will be Samuel M. Please state
24 your name and affiliation for the record. I'm unmuting you
25 now.

1 MR. MULUGETA: Hello, can you guys hear me?

2 MR. RIDER: Yes. We can.

3 MR. MULUGETA: Perfect, perfect. Hi, my name is
4 Samuel Mulugeta. I'm just a California resident. Firstly,
5 I want to say good morning and thank you for the
6 opportunity to speak today. I want to start by saying I
7 appreciate the work that the Commission is doing to reduce
8 emissions, improve efficiency, and protect California's
9 environment.

10 With that being said, I have serious concerns
11 about the Proposed Replacement Tire Efficiency regulation
12 because tires are not just another consumer product. Tires
13 are one of the most important safety components on a
14 vehicle. Also, California has some of the most diverse
15 driving conditions in the country. We have freeways,
16 mountains, canyon roads, coastal highways, steep grades,
17 curvy back roads, and we have a lot of sunny weather, which
18 means many people drive sports cars, performance cars, and
19 other cars that require specific tire ratings year-round.

20 For people like me, tire choice is not just about
21 preference. It's about safety. When I commute, I want the
22 best tires I could reasonably buy to protect myself, my
23 family, and everyone else on the road. A high-performance
24 vehicle needs tires that match the vehicle's braking,
25 cornering, and handling capabilities. Without the correct

1 tires, the vehicles can lose traction more easily,
2 especially during emergency braking and quick lane changes
3 or sharp curbs.

4 I understand that the proposal is focused on
5 rolling resistance and efficiency. However, if someone
6 wants increased grip and safety depending on the vehicle
7 they drive, they should not be forced into buying a
8 lower-rolling resistance tire that may not match their
9 needs. If my priority was slightly better fuel economy, I
10 would choose that tire that reflects that, but if my
11 priority is grip, control, and safety, I should still have
12 the ability to choose a tire designed for that purpose.

13 My concern is that if this regulation removes too
14 many tire options from the market, consumers will have
15 fewer choices, and we know fewer choices usually means
16 higher prices that can hurt working families, commuters,
17 car owners who already struggle with the cost of
18 maintaining a vehicle in California.

19 It could also force people into tires that may be
20 more efficient on paper but are not the best fit for their
21 vehicle or driving conditions. A one-size-fits-all
22 approach does not work for tires. Different drivers need
23 different tires for different reasons. Someone who spends
24 most of their time driving around the city may be fine with
25 all-season tires, but someone who drives canyon roads,

1 mountain roads, long highway commutes, or owns a sports car
2 may need a higher-rated tire with more grip and more
3 performance. There are many ways to improve emissions, but
4 restricting access to proper tires raises a serious safety
5 concern.

6 Everyone has some impact on emissions, but the
7 one thing we should be extremely careful about is
8 regulating the only part of the vehicle that keeps people
9 connected to the road. I respectfully ask the Commission
10 to carefully consider consumer choice, vehicle-specific
11 tire requirements, and real-world California driving
12 conditions. Thank you.

13 MR. RIDER: Thank you for your comments, Samuel.

14 MR. MULUGETA: Thank you.

15 MR. KELLEY: All righty. Let's move on to the
16 next speaker.

17 The next speaker will be Alex Borgas. Please
18 state your name and affiliation for the record. I'm
19 unmuting you now.

20 MR. BORGAS: All right. Hi, there. Thanks for
21 hearing our comments. My name is Alex. I'm also the Board
22 Chair for CalPIRG students, the California Public Interest
23 Research Group.

24 And keeping the public interest in mind, I just
25 want to speak in favor of these regulations. I think that

1 it's a common-sense thing to do, especially when gas prices
2 are so high and in the midst of a climate crisis. Anything
3 that we can do to boost fuel efficiency and make sure that
4 our tires are getting every inch out of them that we can.

5 This also, from their findings, would not have a
6 serious impact on safety standards, and with the equivalent
7 of taking 400,000 cars off the road, it just seems like,
8 like I said, a common-sense thing to do.

9 So yeah. Thank you.

10 MR. RIDER: Thank you for your comment, Alex.

11 MR. KELLEY: All righty. Let's move to the next
12 speaker.

13 The next speaker will be David Reichmuth. Please
14 state your name and affiliation. I'm unmuting you now.

15 MR. REICHMUTH: Hello, my name is David
16 Reichmuth. I'm the research director in the Clean
17 Transportation Program at the Union of Concerned
18 Scientists. On behalf of our over 100,000 members, I urge
19 the CEC to adopt the replacement tire efficiency standards
20 without delay.

21 You know, as the presentation showed, the
22 standards are the product of extensive and thoughtful
23 research and are highly cost-effective for California
24 drivers. By 2035, California drivers would be saving
25 almost \$1 billion annually statewide in fuel costs, and as

1 the presentation showed, the initial payback period is less
2 than six months. The proposed standards would reduce
3 annual greenhouse gas emissions by 2 million metric tons,
4 and that's equivalent to removing 400,000 gasoline vehicles
5 from California's roads.

6 And the presentation, I think, also shows clearly
7 that the standards would not negatively impact tire safety
8 or longevity. The data is clear from real-world and
9 laboratory data on more than 150 of the most popular tire
10 models, and it shows that increasing the efficiency of the
11 tires does not require reducing their average lifespan or
12 tread wear, and many tires already perform well on both
13 efficiency and lifespan or tread wear.

14 And, you know, I think reducing rolling
15 resistance is also a key strategy that tire manufacturers
16 have already committed to in order to reduce emissions from
17 their products. We've already heard that today in the
18 comments from several manufacturers today. The CEC has
19 spent considerable time and effort crafting standards that
20 reduce costs for drivers, reduce emissions from driving,
21 all while ensuring safety and longevity.

22 I urge the Commission to implement these
23 standards without delay. Thank you to the Commission and
24 their staff for their work on this and for the opportunity
25 to speak today. Thank you.

1 MR. RIDER: Thank you, David, for your comment.

2 MR. KELLEY: All righty. Let's move to the next
3 speaker.

4 The next speaker will be Danette. Please state
5 your name and affiliation for the record. I'm unmuting you
6 now.

7 MS. WICKER: Hello. Can you hear me?

8 MR. RIDER: Yes.

9 MS. WICKER: Hello. My name is Danette, and I am
10 with Climate Action California. I just wanted to go over a
11 few points that previous speakers have mentioned. So with
12 the proposed standards, California drivers would save an
13 average of \$179 to \$246 in fuel costs over the lifetime of
14 a set of tires, which is not insignificant. And in the
15 next nine years, California drivers would be saving almost
16 \$1 billion annually statewide in fuel costs. That's also
17 huge.

18 Environmental impacts. In the next nine years,
19 the proposed standards would reduce annual greenhouse gas
20 emissions by 2 million metric tons, equivalent to removing
21 400,000 vehicles from California roads. In the next nine
22 years, the proposed standards would reduce annual emissions
23 of smog-forming NOX by 430 tons and lung-damaging PM2.5
24 emissions by 20 tons.

25 That's huge for me as one of hundreds of

1 thousands of people who suffer from asthma and breathing
2 issues. This is really good news. I have a lot of days
3 where I can't even go outside because of the particulate
4 matter and pollution in the air. It's hard for me to
5 breathe. I have asthma attacks. So this is only a good
6 thing.

7 And as stated before, the world's largest tire
8 manufacturers, including Goodyear, Michelin, Bridgestone,
9 and Continental, have already committed to reducing rolling
10 resistance as a core business and decarbonization strategy.
11 To me this is low-hanging fruit, and why not do that,
12 everything that we can to lower emissions at this point.

13 California standards would help ensure that the
14 full range of tire choices are available, including low-
15 cost brands and models, which many consumers choose,
16 incorporate these technological improvements, which is, I
17 believe, a concern that a previous speaker had. This is
18 not going to affect safety or grip on the road, and that
19 probably needs to be made -- that information needs to be
20 widely available to the public. Thank you.

21 MR. RIDER: Thank you for your comment, Danette.

22 MR. KELLEY: All righty. We'll move to the next
23 speaker.

24 Next speaker will be Ed Pike. Please state your
25 name and affiliation. I'm going to unmute you now.

1 MR. PIKE: Hi. My name is Ed Pike, and I am
2 commenting on behalf of myself as a California citizen. I
3 have previously conducted several research projects
4 regarding low-rolling resistance and safe tires for a
5 variety of clients, And I'm speaking in support of the
6 California Energy Commission proposal today.

7 Obviously, there's a huge consumer cost savings,
8 which you've talked about earlier. And I think that
9 consumers really need this in facing today's affordability
10 challenges. Right now there's no clear source of consumer
11 information. As a consumer, I really don't have any clear
12 source of information, even having done extensive research
13 when I'm buying replacement tires. So I think both the
14 standards and the ratings and consumer information will be
15 extremely valuable.

16 I support the improved safety requirements with
17 minimum wet grip standards to remove the worst tires from
18 the market. There is no inherent conflict between
19 fuel-efficient tires and wet grip. Rather, we can achieve
20 better tires that help consumers in various aspects,
21 including both fuel savings and also improving safety at
22 the same time. And again, with wet grip, there's no way
23 for consumers to achieve that without this program. So
24 it's essential for improving safety as well.

25 And many international programs already promote

1 these types of tires. It's a well-established technology.
2 There's nothing new or risky or particularly novel about
3 extending existing fuel-efficient, safe tire technology and
4 making sure consumers can access that in the replacement
5 market as well.

6 And of course, there are huge greenhouse gas
7 benefits, public health benefits. And so, again, I support
8 your efforts. Thank you.

9 MR. RIDER: Thanks for taking the time to
10 comment, Ed.

11 MR. KELLEY: All right. Let's move to the next
12 speaker.

13 The next speaker will be Diana Natalia Ruvalcaba
14 Nunez. I'm unmuting you now. Please state your name and
15 affiliation for the record.

16 MS. NUNEZ: Hello. Good morning, Commission.
17 I'm Diana Ruvalcaba Nunez, an environmental studies student
18 at UC Santa Barbara, but I'm also the statewide secretary
19 of CalPIRG students.

20 I speak today in strong support of implementing
21 these higher efficiency tires. As a lifelong resident of
22 the Inland Empire, which is one of the highest smog-
23 polluted and particle-polluted areas in California, which I
24 have been able to see firsthand, I know these effects can
25 be amplified from car emissions, whether from fuel or tire.

1 Economically, the best choice is oftentimes the
2 environmentally friendly option, as a society will spend
3 less on bearing the cost of pollutants of typical
4 replacement tires, while it's less emission and fuel
5 consumption. The Inland Empire, where I have spent my
6 whole life, is a massive commuter area. I personally
7 remember driving a minimum of 30 minutes to get to school
8 every single day, though I cannot imagine how much more
9 cost-efficient my day-to-day life could have been.

10 I also cannot imagine if everyone had access to
11 these tires, how much money and resources we could save,
12 though I know we've briefly gone over it in this meeting.

13 It makes sense to make the most environmentally
14 and economically efficient option. By implementing more
15 efficient tires, we can aid pollution and costs across all
16 of California. I urge the Commission to implement more
17 efficient replacement tires. Thank you so much.

18 MR. KELLEY: All righty. Thank you for your
19 comment. Let's move to the next speaker.

20 The next speaker will be Christina Lardie.
21 Please state your name and affiliation for the record. I'm
22 going to unmute you now.

23 MS. LARDIE: Hello. My name is Christina Lardie.
24 I am representing myself. I'm here to share my perspective
25 and personal experience from a consumer and a gearhead in

1 training.

2 I wanted to make sure that I attended this entire
3 meeting, listened to all that you have to say. It sounds
4 amazing. It sounds like it's going to be cost-effective,
5 help the environment, and all of that. My question,
6 though, is if it's so great, why -- this is a selling point
7 for manufacturers, and it seems like this is all wonderful,
8 you're saying that it's not going to add additional cost.

9 Wouldn't the consumers want to buy certain
10 products because of all of these benefits? Why is it
11 opposed by SEMA and a national industry coalition where the
12 coalition letter was submitted and signed by SEMA,
13 Goodyear, Yokohama, the California Tire Dealers
14 Association, and more?

15 It just doesn't make sense to me that saying that
16 in order to enforce all this, there's going to be more
17 people, and that sounds well and good. How much is that
18 going to cost us?

19 And I called my local Firestone to compare the
20 price that my husband and I both paid for tires previously
21 and how much it is today, these are numbers that I have
22 paid myself. Today, to get a set of tires for my husband's
23 2005 Ford Escape, it would cost \$975. For my 2006 Chevy
24 Silverado, it would cost between \$1,500 and \$1,800. They
25 said commercial tires, which no one has discussed today,

1 that that would cost even more, and that has increased \$300
2 to \$600 since the last time we changed our tires, which was
3 in 2020 and even last year, 2025.

4 So I definitely have a lot of concerns in terms
5 of any kind of cost increase. That's a significant amount
6 of money for people. Like, my husband and I, We take very
7 good care of our cars. We do all the regular maintenance.

8 It sounds wonderful, all the data you are
9 producing, but if it's so well and good, why is it so
10 opposed by these large groups? Why wouldn't consumers just
11 want to choose this on their own? Why does it need to be
12 regulated, also limiting our choices?

13 And I don't understand why, if this is so
14 wonderful, all these numbers are great, like, you guys are
15 pretty much all in support of it -- which, you know, I'm
16 listening to everybody -- I don't understand why the
17 companies wouldn't want to do it now, if there's not any
18 other additional cost for taxpayers, also consumers in
19 general. Also, if it's affecting commercial tires as well,
20 that's going to affect cost of services and goods for us
21 down the road as well.

22 I talked to the associate at Firestone. She said
23 you could have to change your tires between a year to six
24 years. So that just seems like a lot of money to me.

25 Thank you so much for your time.

1 MR. RIDER: Thank you for your comment,
2 Christina.

3 MR. KELLEY: All righty. We'll move to the next
4 speaker.

5 The next speaker will be Dan Jacobson. Please
6 state your name and affiliation. I'm unmuting you now.

7 MR. JACOBSON: Thank you very much. My name is
8 Dan Jacobson, Senior Advisor to Environment California,
9 speaking in support of this rule.

10 Along with Bill Magavern, myself, I was one of
11 the original supporters of the Bill 844 by Assemblymember
12 Nation that set these proceedings into motion, and we're
13 thrilled to see that this is happening now. To be honest,
14 it really couldn't be happening at a better time. This
15 will save gas, this will save money, and this will reduce
16 air pollution. This is a win-win-win. We're in strong
17 support of the Proposed Replacement Tire Efficiency
18 standards and urge them to be swiftly implemented.

19 Because of the timing of this hearing, I wanted
20 to, just for the record, include all of the groups that
21 have reached out to us to ask to be included in this, and
22 I'll do that within my allotted time. The Endangered
23 Habitats League, Rise South City, Recolte Energy, the
24 Center for Environmental Health, the San Francisco Bay Area
25 Physicians for Social Responsibility, Los Angeles Climate

1 Reality Project, Silicon Valley Youth Climate Action,
2 Climate Reality Project Orange County Chapter, Brightline
3 Defense, 350 Bay Area, Bay Area Clean Air Coalition, Oil
4 and Gas Action Network, the Alliance for Nurses for Healthy
5 Environments, Act Now Bay Area, Resource Renewal Institute,
6 Indivisible Marin, Redwood Alliance, 350 Humboldt, Santa
7 Cruz Climate Action Network, Active San Gabriel Valley,
8 Catholic Charities of Stockton, Climate Action California,
9 Sunflower Alliance, Tubb Canyon Desert Conservancy,
10 Sacramento Indivisible, Grid Alternatives, Central
11 California Asthma Collaborative, Environmental Protection
12 Information Center, Healing and Justice Center, California
13 Nurses for Environmental Health and Justice.

14 There's just overwhelming support for this, and I
15 encourage the Commission to adopt these rules as soon as
16 possible, and want to take a minute just to thank the staff
17 for the outstanding work they've done here. Thank you very
18 much.

19 MR. RIDER: Thank you for your comment, Dan.

20 MR. KELLEY: All righty. Let's move to the next
21 speaker.

22 The next speaker will be Kenny Byerly. Let's
23 see. Please state your name and affiliation for the
24 record. I'm unmuting you now.

25 MR. BYERLY: Hello. My name is Kenny Byerly.

1 I'm an auto enthusiast, and thank you for letting me speak.

2 I want to acknowledge that the Commission has
3 definitely considered many important factors, and I
4 appreciate your efforts to address the various tire use
5 cases that are out there and to try to think of every
6 detail, but I still remain skeptical of this legislation.

7 The plan, as you presented it, suggests that this
8 will have minimal effect on costs and the market, but, of
9 course, proponents of any legislation are predisposed to
10 interpret data in a way that supports their case. For
11 example, you present rolling resistance versus price to
12 suggest that it doesn't affect the cost, and you also have
13 a chart that presents rolling resistance versus long life
14 and rolling resistance versus tire grip. So you can have
15 rolling resistance and low cost. You can have rolling
16 resistance and high performance.

17 But there's no chart that compares all three of
18 these things. We don't know if you can have rolling
19 resistance and high performance and long life but not
20 increase the price. So just for example, tires that have
21 it all might be the more expensive ones. We can't really
22 tell from this data, and in any case, reality doesn't
23 always meet estimates. Regulations always have unintended
24 consequences regardless of good intentions.

25 Trump said that his tariffs wouldn't increase

1 prices, but how did that work out? Gas prices. California
2 has a lot of additional regulations on gas, and we're
3 paying twice as much as the rest of the country.

4 In this moment where we have an affordability
5 crisis, if this distorts the market, increases prices for
6 tires, that hits lower income drivers and lower income car
7 enthusiasts the hardest, and all these cost savings people
8 are talking about, your own data shows that compliant tires
9 are already on the market. People can buy these tires now.
10 If they're not choosing them, they may not have the
11 information, but it's likely because they are more
12 expensive, and this -- complying with these regulations
13 will cost money. It will be passed on to consumers. If
14 there aren't trade-offs, then why wouldn't everyone produce
15 high-performance and low rolling resistance tires for low
16 cost already? This will restrict consumer choice, and
17 consumers have to be able to choose the best options for
18 their needs.

19 Setting a consistent standard and providing more
20 information to the consumer is a good thing. I do worry
21 about increased costs for manufacturers to go through
22 certification, increased costs to taxpayers, to maintain a
23 database of every tire, slowing the amount of time for new
24 products to get to market. All these things are a concern,
25 but at least consumers would be able to choose whether

1 efficiency was a priority to them, because most people
2 would, and this would realize the cost savings that
3 supporters are so excited about without requiring mandatory
4 compliance and reducing consumer choice.

5 Because some people have specific needs for their
6 tires, performance, off-road applications, and some people
7 also are going to -- well actually I'm running out of time,
8 but people have different needs, and you can't account for
9 every single behavioral difference that is going to change
10 fuel efficiency. Thank you.

11 MR. RIDER: Thank you for your comment, Kenny.

12 MR. KELLEY: All righty. Let's move to the next
13 speaker.

14 The next speaker will be Matt Davis. Please
15 state your name and affiliation for the record. I'm
16 unmuting you now.

17 MR. DAVIS: Can you guys hear me? Hello?

18 MR. KELLEY: Yes.

19 MR. RIDER: Yes, we can hear you.

20 MR. DAVIS: Hello. Yes, this is Matt Davis. I
21 represent the car community, racing community, small
22 businesses, and everyone who actually drives cars in this
23 state.

24 So I am against the proposal because this
25 proposal will actually increase tire costs as well as

1 insurance and business insurance as well. You might ask,
2 how does insurance go up because of this? And that's
3 because we saw no graph or statistics about drive
4 performance and braking distance. So a grippier tire
5 obviously has a higher rolling resistance, but that also
6 means that it stops at a lower distance. So if we have
7 tires with higher -- or, sorry, lower rolling resistance,
8 that means our braking distance are increased in drive
9 performance and that obviously is a safety hazard for all
10 vehicles. Some vehicles affected more than others.
11 Obviously, weight, tire size, width, all of this is a
12 factor.

13 I've already spoken with insurance companies, and
14 they have 100 percent guaranteed that prices will go up,
15 and it's kind of sad because businesses already suffer
16 enough in this state.

17 And, you know, because of higher insurance costs,
18 we obviously will not be able to pass any raises or
19 increases down to employees. If anything, there will be
20 wage cuts due to this. So this does not help anyone in the
21 State of California. Also, the only thing that we saw was
22 wet performance graphs and obviously, as you guys know, if
23 you live in this state, it does not rain very often. So I
24 don't know why that's a huge priority.

25 If we actually want wet performance or rolling

1 resistance or efficient tires or grippier tires, I think
2 that should be down to the actual individual and their
3 choice in the matter. I think California people are smart
4 enough to either make the decision on their own or
5 actually, you know, take a recommendation from someone that
6 they trust and decide what their priorities are and which
7 tire they should actually buy.

8 I don't believe that these higher or lower
9 rolling resistance tires will actually help emissions at
10 all because we'll just be replacing them more, we'll be
11 spending more, everything will just cost more. As you
12 know, gas in this state already costs us about \$2 more per
13 gallon. Having special tires just like special gas will do
14 just about the same thing for tires as it does for gas in
15 this state, so I'm highly against this proposal.

16 I think if we want emissions savings, we should
17 look at bunker fuel and stuff like that on cargo ships.

18 Thanks.

19 MR. RIDER: Thank you for your comment, Matt.

20 MR. KELLEY: All righty. Let's move to the next
21 speaker.

22 The next speaker will be Beth Hammon. Please
23 state your name and affiliation for the record. I'm going
24 to mute you now.

25 MS. HAMMON: Hi, my name is Beth Hammon, and I'm

1 a Senior Advocate with the Natural Resources Defense
2 Council speaking in support of the proposed rulemaking.
3 NRDC has been engaged and really appreciates the
4 Commission's extensive technical analysis, stakeholder
5 engagement, and thoughtful development of this proposal.

6 This proposal tackles an often overlooked
7 opportunity to reduce both transportation costs and climate
8 pollution. Tire efficiency has a direct impact on how much
9 fuel or electricity a vehicle uses, and by establishing
10 clear standards and providing transparent consumer
11 information, the proposed program will help drivers save
12 money, reduce emissions, and ensure that replacement tires
13 keep pace with California's broader transportation and
14 climate goals. The CEC staff report demonstrates that
15 these standards are technically feasible, cost-effective,
16 and can be achieved without compromising safety or tire
17 life. The proposal also includes important safeguards,
18 including a wet grip minimum performance standard, and is
19 supported by a strong technical record.

20 Importantly, this proposal also demonstrates that
21 California does not have to choose between affordability,
22 public health, and climate progress. More efficient
23 replacement tires reduce energy consumption across the
24 vehicle fleet, helping drivers spend less on fuel while
25 reducing greenhouse gas emissions and other harmful

1 pollution. Because transportation costs consume a larger
2 share of income for lower-income households, and because
3 many frontline communities continue to bear the burden of
4 transportation-related pollution, the benefits of this
5 proposal extend beyond efficiency alone. At a time when
6 Californians continue to face high transportation costs and
7 the state is working to reduce emissions from the
8 transportation sector, this proposal represents a
9 practical, common-sense policy that advances affordability,
10 public health, and climate goals simultaneously.

11 We encourage the Commission to move forward with
12 the proposed standards and appreciate the staff's attention
13 to this issue. Thank you so much for the opportunity to
14 comment today.

15 MR. RIDER: Thank you for your comment, Beth.

16 MR. KELLEY: We'll move to the next speaker.

17 The next speaker will be John Baldwin. Please
18 state your name and affiliation for the record. I'm
19 unmuting you now.

20 MR. BALDWIN: Can you hear me?

21 MR. RIDER: We can hear you.

22 MR. BALDWIN: Hello, Commissioners. My name is
23 John Baldwin from America's Tire, also known as Discount
24 Tire. We operate 151 stores across California, and I
25 appreciate the opportunity to speak today.

1 I want to start by thanking the Commission for
2 its collaborative approach in developing this proposal. We
3 truly appreciate the Commission's engagement with retailers
4 and its willingness to incorporate real-world data into the
5 rulemaking. Seeing real-world tire mileage and safety data
6 from our Treadwell program reflected in this proposal,
7 particularly in shaping the long-life tire category, gives
8 us confidence that this program is grounded in how tires
9 actually perform for California drivers. That kind of
10 data-driven collaboration strengthens the foundation of
11 this program.

12 We support California's energy efficiency and
13 emissions reduction goals, and we commend the Commission
14 for the significant improvements made since earlier drafts.
15 The extended phase-in timeline provides a realistic path to
16 compliance. The tiered structure appropriately recognizes
17 that different tire categories face different design
18 constraints. The addition of a minimum wet traction
19 requirement reinforces that safety remains a priority, and
20 the streamlined compliance approach without point-of-sale
21 labeling requirements reduces unnecessary operational
22 burden while still ensuring accountability.

23 While we're optimistic and broadly supportive,
24 our support for this program remains conditional on
25 sustained attention to consumer cost and product

1 availability. Critical to the success of this program is
2 the understanding that tires are a nondiscretionary
3 purchase. Drivers cannot opt out. If highly efficient
4 tires carry significant price premiums or meaningfully
5 narrow the available selection, the burden will fall
6 disproportionately on cost-sensitive consumers.

7 As one practical illustration, if the Phase II
8 requirements beginning in 2031 were applied to the tires we
9 sell in California today, roughly 70 percent of currently
10 available options would be removed from the market. These
11 are addressable challenges, assuming the Commission
12 maintains active engagement with retailers and
13 manufacturers throughout implementation and is willing to
14 adjust the program requirements if real-world market and
15 performance data indicate that consumer cost or product
16 availability will be unreasonably compromised.

17 America's Tire is committed to supporting the
18 Commission through periodic check-ins and data sharing over
19 the coming years to help ensure the program stays on track
20 and delivers its intended benefits.

21 In closing, we appreciate the Commission's
22 willingness to work with stakeholders and embrace real-
23 world data to improve this proposal. We look forward to
24 continuing to partner with you to ensure the program
25 delivers meaningful efficiency gains while preserving

1 safety, affordability, and consumer choice for California
2 drivers. We are all Californians, too, here at Discount
3 Tire with 151 stores. Thank you for your time and
4 consideration.

5 MR. RIDER: Thank you for your comment, John, and
6 your partnership.

7 MR. KELLEY: Great. Let's move to the next
8 speaker.

9 The next speaker will be James. Please state
10 your name and affiliation. I'm unmuting you now.

11 JAMES: Can you hear me?

12 MR. KELLEY: Yes.

13 JAMES: My name is James, and I'm just an
14 independent citizen.

15 I am surprised that this particular topic has
16 been brought up, which is the concern over the right to
17 repair. A big misnomer about this movement is that it
18 doesn't start at the ability to repair the parts or what
19 list of parts are available. It starts at the
20 manufacturing level and the dealership level.

21 We've seen this time and time again, where the
22 ability to repair our vehicles is doable, but because of a
23 made regulation that didn't exist before impacted the
24 consumer directly because of a dealership or because of
25 entities that now have a reason to stronghold the entire

1 supply chain.

2 The biggest issue that we face is the long-term
3 stress, and particularly in America, where this is impacted
4 the most is when it comes to well, we have a standard now
5 that we can implement, that we can use to help gain to X
6 goal or Y results.

7 In the biggest case that has come to exist is
8 with John Deere. They restrict everything from the
9 computers to monitor the tractors to even voiding
10 warranties because of the wrong tire size or a different
11 tire tread, et cetera. This is actually kind of
12 America-exclusive. The EU has much better laws in
13 protecting people from standards that get implemented for
14 people to purchase.

15 I think that the costs are going to rise, but I
16 think it's because of a different reason than we're all
17 thinking. I understand that we need to have cleaner air.

18 However, I think that none of that is going to be
19 made in point. I know that people are standing up against
20 that, and those are going to be the first actors to rise
21 the cost because they now have a tire lineup that is
22 exclusive to California, and we're going to be seeing the
23 advertisements for it and the excuses for it. I know
24 people are here in support of it from tire manufacturers
25 and tire dealerships, but I know from confidence and from

1 my work experience doing tech work for many different
2 industries that the costs are going to rise, and it may
3 even be in their best interests to try and get the best
4 deals for us consumers. However, because of the market and
5 because of a compliance, that just won't be the case.

6 I do not disagree with this. I know this is
7 going to get ruled on anyway, but if it does get ruled on,
8 I would like to see something that better protects the
9 consumer than just saying we have a compliance and let's
10 move forward with this. I want to thank you for your time.

11 MR. RIDER: Thank you for your comment, James.

12 JAMES: Thank you.

13 MR. KELLEY: Okay. All righty. Just wanted to
14 reiterate that we have a limit of one commenter per
15 organization.

16 Okay. Let's move on to the next speaker.

17 Next speaker will be a phone number ending in
18 470. Please state your name and affiliation for the
19 record. I'm unmuting you now.

20 (Pause)

21 MR. RIDER: You are unmuted.

22 MR. KELLEY: Yep. Can't hear you. Feel free to
23 raise your hand again.

24 MR. SPEARS: Can you hear me now?

25 MR. RIDER: Yes. We can hear you.

1 MR. SPEARS: Hello?

2 MR. RIDER: Can you hear --

3 MR. SPEARS: Hi, my name is Jay Spears from --
4 hello. My name is Jay Spears from Continental Tire. We
5 are in favor of the state's continued push for fuel
6 efficiency, specifically in tires, but we do have some
7 worries specifically within enforcement and compliance of
8 this issue.

9 We know that the Energy Commission has a long
10 history of enforcement compliance, but I'm not sure that
11 the Commission has ever looked at the sheer number of SKUs
12 that are coming at them with this. I think probably
13 somewhere north of 50,000 SKUs, many of which will have
14 test results that cannot be verified, specifically wear
15 results or traction results, and many of the rolling
16 resistance results would have to be verified SKU by SKU at
17 an extreme cost to the Commission.

18 Also have many worries about the exemption for
19 articles that have 15,000 or fewer tires sold. I don't see
20 of any way that the Commission can ensure that that number
21 is upheld. There is no way to verify that number and it
22 would just be a self-certification from the individual
23 companies.

24 I also believe there's going to be an extreme
25 number of companies that have little or no products outside

1 of that 15,000 category, which would exempt all of their
2 products. I think that would probably be 60 or 70 percent
3 of the tire manufacturers would have little or no products
4 that would not be exempt, and even some of the major
5 manufacturers would have the majority of their products
6 that would be exempted because of that provision.

7 We also have real worries about specific
8 applications that we would lose altogether, one of which is
9 recreational motorsports. We believe that with these
10 limits, you would eliminate recreational motorsports almost
11 entirely within California. There's about 20,000 active
12 members within these programs of NASA or the individual
13 track days within California that would lose their ability
14 altogether to have tires that function with the traction
15 that they need in order to compete.

16 Also, it was mentioned earlier that companies
17 like Tesla had the ability to perform in motorsports with
18 these sorts of tires. I would say as an original equipment
19 manufacturer of Tesla, many of their tires would not meet
20 this requirement.

21 MR. KELLEY: Thirty-second warning.

22 MR. SPEARS: They have transitioned to higher
23 rolling resistance tires in order to gain more wear.

24 But thank you for your continued work in fuel
25 efficiency. Our company is committed to that.

1 MR. RIDER: Thank you for your comment, Jay.

2 MR. KELLEY: All righty. Let's move to the next
3 speaker.

4 Next speaker will be Paul Lau. Please state your
5 name and affiliation for the record. I'm unmuting you now.

6 (Pause)

7 Paul, you're still on mute.

8 All righty. We'll move to the next speaker.
9 Please feel free to raise your hand. We'll circle back.

10 All righty. The next speaker will be Tracey
11 Norberg. Please state your name and affiliation for the
12 record. I'm unmuting you now.

13 MS. NORBERG: Good morning. My name is Tracey
14 Norberg. I'm Executive Vice President and General Counsel
15 of the U.S. Tire Manufacturers Association. Thank you for
16 the opportunity to comment on the proposed tire efficiency
17 regulation.

18 USTMA manufacturers operate 55 facilities across
19 16 states, and we support nearly a million jobs nationwide.
20 We have engaged in this rulemaking from the beginning, and
21 we appear today in a constructive spirit.

22 We share the Commission's goals of improving
23 energy efficiency and providing consumers with meaningful
24 performance information. We also recognize that there are
25 real and quantifiable performance tradeoffs for tires among

1 rolling resistance, tread life, and wet traction, and that
2 these tradeoffs can have downstream consequences, including
3 increased scrap tire generation and higher replacement
4 costs for consumers.

5 These tradeoffs can be particularly pronounced
6 for certain categories, and so today I will highlight where
7 we believe the proposal can be strengthened, and we will
8 submit written comments for the record next week.

9 First of all, applicability. We urge the
10 Commission to exempt original equipment tires sold as
11 replacements. These tires are developed to precise
12 vehicle-specific safety specifications, and USTMA member
13 companies are often contractually obligated to provide them
14 in the aftermarket. We also recommend excluding street-
15 legal race tires, which are not designed for sustained road
16 use.

17 Second, with respect to light truck tires, we
18 want to highlight that the proposed wet traction test, the
19 ISO 23671, was developed and validated for passenger car
20 tires only. It has not been validated for LT tires, and
21 applying it to LT tires would produce unreliable results.
22 We recommend, therefore, deferring the LT tire requirements
23 until an appropriate test methodology can be studied,
24 validated, and adopted.

25 Third, I'd like to address tires for use in

1 severe snow conditions. We recommend a single, clear
2 definition based on the objective ASTM F1805 performance
3 threshold and the presence of a three-peak mountain
4 snowflake marking to indicate tires for use in severe snow
5 conditions, and that these tires should be exempt from the
6 regulation. They are treated currently in the proposal
7 differently, depending on which document you look at, and
8 we encourage the Commission to unify that approach.

9 Fourth, compliance framework. The regulation
10 should include a tire family certification structure, which
11 would allow representative testing across groups of tires
12 that share common design characteristics, along with
13 explicit measurement tolerances for rolling resistance and
14 wet grip. These are consistent with international
15 standards and protect accurate information.

16 Fifth, enforcement. An uneven enforcement
17 environment harms companies that are doing the right thing
18 and complying with the regulation. We recommend the CEC
19 implement clear market surveillance and enforcement
20 mechanisms, ensuring all tires allowed for sale in Phase 1
21 are fully compliant with both recommended minimum
22 performance standards and the rating requirements. And we
23 urge the Commission to support the U.S. Customs and Border
24 Protection to establish enforcement mechanisms.

25 Last, we do encourage the Commission to build in

1 a review of the Phase 1 program before implementing Phase
2 II. We do remain committed to working with the Commission
3 staff as it works to produce a regulation that is
4 technically sound, practically enforceable, and equitable
5 for all market participants. Thank you.

6 MR. RIDER: Thank you for your comment, Tracy.

7 MR. KELLEY: All righty. Let's move to the next
8 speaker.

9 Next speaker will be Cat Mac. Please state your
10 name and affiliation. I'm unmuting you now.

11 (Pause)

12 Cat Mac, we can't hear you. You're still on
13 mute.

14 (Pause)

15 All righty. Well, feel free to raise your hand
16 again. We'll circle back. All righty. The next speaker
17 will be Greg. Please state your name and affiliation for
18 the record. I'm unmuting you now.

19 GREG: Hey, I apologize. Can you hear me?

20 MR. RIDER: Yes, we can hear you, Greg.

21 GREG: Perfect. Thank you so much. Hi, my name
22 is Greg. I have no affiliation. I'm a mechanical
23 engineer, I'm a car enthusiast, and I build kit cars in my
24 spare time.

25 My primary interest in talking today is in

1 protecting choices for automotive enthusiasts while
2 retaining all the benefits of this legislation. And on
3 that note, I'd like to start out by saying that for your
4 average consumer whose primary purpose is commuting, so the
5 overwhelming, overwhelming majority of Californians, this
6 legislation is excellent. I think the implementation of
7 dry and wet grip indices to establish minimal acceptable
8 standards will go a long way to improving road safety, and
9 the data shows it still leaves ample options at all price
10 ranges, thereby ensuring great accessibility. Additionally,
11 I think that the minimum efficiency standards for rolling
12 resistance is a meaningful step forward towards improving
13 vehicle efficiency statewide.

14 My main concerns with this legislation are
15 specifically from my standpoint as a car enthusiast,
16 specifically racing in classes that have certain treadwear
17 requirements. So there's a lot of classes within Sports
18 Car Club of America or NASA or what have you that have a
19 200 treadwear minimum, and so there are a lot of tires that
20 exist right at that threshold. These tires -- so racers
21 are an interesting breed. We typically have more than one
22 set of wheels. We'll typically have a specific set of
23 competition wheels and tires, or we'll have them mounted to
24 a car that's barely driven.

25 So often tires in this category see almost no

1 actual road use, and again they're driven in sanctioned
2 racing situations, so total efficiency and any of the
3 efficiency gains that are targeted by this legislation are
4 pretty much nullified.

5 So I do think there should be some sort of a
6 carve-out specifically for street legal competition tires.
7 This affects a lot in the 200 treadwear and 100 treadwear
8 categories.

9 I think one other potential option would be
10 against the earlier cited 15,000 tire a year limit.
11 Potentially raising that limit to account for these
12 lower-volume sold tires could be another way around that.

13 So, again, I appreciate this legislation and I
14 think that, again, for the overwhelming majority of
15 California car owners and operators, I think this is going
16 to be really good, really impactful, really meaningful
17 legislation. I just want to make sure that we retain all
18 those benefits while still being cognizant of the specific
19 needs of the car community. Thank you so much.

20 MR. RIDER: Thank you for your comment, Greg.

21 MR. KELLEY: All righty. Let's move to the next
22 speaker.

23 Next speaker will be Kristel Rietesel. Please
24 state your name and affiliation for the record. I'm
25 unmuting you now.

1 (Pause)

2 MR. RIDER: You're unmuted, Kristel.

3 MS. RIETESSEL: Sorry, can you hear me now?

4 MR. RIDER: Yes. We can hear you now. Thank
5 you.

6 MS. RIETESSEL: Okay. Thank you. Thank you for
7 the opportunity to speak. I'm with the Bay Area Clean Air
8 Coalition, and we support the proposed standard.

9 As someone with asthma, I appreciate stopping air
10 pollution that makes me and others sicker. Air pollution
11 is linked to the increased likelihood of many diseases like
12 cancers, heart disease, dementia, and mental health
13 conditions like depression and anxiety, and it is linked to
14 increases in the severity and contagiousness of illnesses
15 like COVID, RSV, rhinoviruses -- which are colds -- sinus
16 infections, and the flu. Stopping air pollution increases
17 the quality of life and saves individuals in our community
18 a lot of money and lost productivity as well. Thank you
19 for the opportunity to speak.

20 MR. RIDER: Thank you for your comment, Kristel.

21 MR. KELLEY: All righty. Let's move to the next
22 speaker.

23 Next speaker will be Dick Albright. Please state
24 your name and affiliation for the record. I'm unmuting you
25 now.

1 MR. RIDER: Let's give Dick a second. I think
2 this is the second time around. Just give him a minute.

3 Dick, you are unmuted from our end, but it looks
4 like you're still unmuted. There might be something you
5 need to do on your end. Let's give it one more second
6 here.

7 (Pause)

8 All right, Dick. We're going to put you back.
9 You're going to have to raise your hand again. We can't
10 hear you, unfortunately.

11 MR. KELLEY: All righty. Let's move to the next
12 speaker. This is a phone number ending in 993. Please
13 state your name and affiliation for the record. I'm
14 unmuting you now.

15 Again, it's star six to unmute yourself.

16 MR. ALBRIGHT: Hello. This is Justin Albright.
17 Can you hear me?

18 MR. RIDER: Yes. We can hear you.

19 MR. ALBRIGHT: Okay. Yeah, this is Justin
20 Albright. I'm a concerned consumer.

21 I think that this rulemaking is kind of on the
22 right track. I mean, the first three, you know, developing
23 a database and providing the information for the consumer
24 in terms of efficiency of the rolling resistance and wet
25 grip are steps in the right direction. The one thing I

1 have an issue with is the restrictions that are going to be
2 placed on purchasing tires in California that are only
3 compliant to the minimum standards.

4 I think some of the other -- I think the trade
5 association and some of the other callers have also noted
6 that that restriction is a little bit too high for people
7 that just want to purchase tires for their own purpose,
8 whether it's off-roading or snow or just having a second
9 set of tires for winter or summer. It becomes too
10 restrictive.

11 When I was younger and I was looking for
12 inexpensive tires, I mean, that was my number one goal, was
13 to buy whatever was the least expensive tire I could find
14 for my vehicle. And even recently, when I look at the
15 prices of tires, they vary across different brands, and I
16 usually will pick one in the middle or maybe one on the
17 lower end because of the cost. And I think that other
18 consumers will have similar issues with anything that costs
19 more or is specifically restricted to California.

20 I think that the environmental impact is being
21 overstated. The majority of pollution provided -- you
22 know, that will be impacted by this is very tiny compared
23 to the overall pollution produced by cars and trucks and in
24 other businesses, and so I think that's a little bit
25 overstated in this study.

1 I appreciate the Commission for studying this and
2 taking my comment. Thank you.

3 MR. RIDER: Thank you, Justin.

4 MR. KELLEY: All righty. Let's move to the next
5 speaker.

6 Next speaker will be Jay Nguyen. Please state
7 your name and affiliation for the record. I'm going to
8 unmute you now.

9 MR. NGUYEN: Yes, hello. Can you hear me?

10 MR. KELLEY: Yes.

11 MR. NGUYEN: Hi, I am a college student, not
12 really affiliated with any organization, and I just wanted
13 to say -- like, speak I guess from a young student's
14 perspective.

15 As a college student, we have to balance tight
16 budgets and, like, I regularly commute to campus, so I
17 really support this tire efficiency program. As a student,
18 every single dollar really counts. I drive -- or I'm an
19 environmental science student, so I chose my car. I have a
20 Prius. I chose my car because I knew it was more efficient
21 for fuel, and that's, like, a plus for saving money and
22 just for protecting the environment as much as I can.

23 I had no idea that, like, aftermarket tires, like
24 the ones that I have to buy to replace the ones that come
25 with my car, often have, like, these significant -- these

1 significantly higher rolling resistance standards, meaning
2 that they consume more energy and drain my fuel economy. I
3 think that the minimum standards really support students
4 like me who don't really know what we're doing when we're
5 purchasing a car. Like, we won't accidentally buy a subpar
6 tire that will punish us when we're at the pump for the
7 next four years.

8 The savings over, like, the lifespan of the tire,
9 I think it's average four years, like, is kind of a lot. I
10 think it says 180 to, like, 200, which is not a lot in the
11 grand scheme of things, but when you think about how many
12 cars are in America -- or, sorry, not in America, within
13 California -- California has the highest number of
14 registered vehicles in the country. Like, we have way, way
15 more registered vehicles, like, even Texas. That number,
16 although small, really piles up. We have, like, at least
17 13 million, like, private automotive vehicles for just,
18 like, regular consumers like me who have to commute to work
19 or school. Requiring the tire manufacturers and brand name
20 owners to report the coefficients and things like that
21 would be, like, a huge game changer, just so that, like, I
22 can make more informed decisions day to day and, like, just
23 know that I'm playing my part to protect the environment.

24 I understand that, like, we're not -- like, the
25 fuel savings or the amount of reduced emissions probably

1 isn't, like, super huge, but I like to know that we're
2 doing everything in our power.

3 And I appreciate you for your time. Thank you.

4 MR. RIDER: Thank you for your comment, Jay.

5 MR. KELLEY: All righty. Let's move to the next
6 speaker. The next speaker will be Cat Mac. Please state
7 your name and affiliation. I'm going to unmute you now.

8 MS. MAC: Hello. Can you hear me?

9 MR. KELLEY: Yes. I'm so sorry about those
10 technical difficulties. Hi, yes, I'm Cat Mac. I'm a pro
11 motor sports model and a motor sports enthusiast, and I'd
12 just like to say thank you for taking the time to hear us
13 out.

14 So freedom of speech and expression, of course,
15 is our constitutional right, and how I choose, and a lot of
16 other people's, to speak and express themselves is through
17 our cars. So California is taking away our freedoms and
18 rights by imposing these laws and these regulations you'll
19 find nowhere else in the states. And all of these
20 regulations are to push hidden agendas, but they're
21 marketed to us as safety standards. That's what it seems
22 like.

23 So as a woman born on American soil, I am not so
24 free to do as I please with my own car, and to that I say
25 why? Is it money farming? Is it putting state businesses

1 and quotas before the people? I truly have no answer other
2 than for control.

3 But all that said, I do thank you so, so much for
4 considering the environment, because as a car enthusiast
5 myself, I do care about the environment.

6 I've been studying the European standards and the
7 studies of tire dust and the runoff in other countries --
8 European studies, as I said -- and to this I say God,
9 Jesus, has created us and the earth to heal ourselves, if
10 we truly have faith and believe. If we as humans want to
11 make a change, we need to analyze the manufacturers and
12 these plants in other countries and even in our own, and
13 these regulations will control the daily consumer, not
14 those manufacturers. The world that produces -- or the
15 world and countries that produce the smog and pollution to
16 the point that humans in those areas are wearing tire
17 shoes. I've seen this and I've studied this in
18 documentaries. Tire shoes on humans.

19 So I oppose these regulations as it is disguised
20 as control to push agendas and feed wallets, is what it
21 seems like. We're losing our rights just on the minimal
22 level of our cars.

23 But again, I do thank you for considering the
24 environment. It just seems like California is pushing more
25 people into hybrids and to electric cars. But we know that

1 that is causing a lot of lithium mining, deforestation, but
2 it's disguised to us as safety standards and regulations in
3 that sense.

4 But again, I do thank you for taking the time to
5 hear us out and to be studying these components because we
6 need to keep talking about it.

7 That's all I have. Thank you.

8 MR. RIDER: Thank you for taking the time to
9 call, Cat.

10 MR. KELLEY: All right. Let's move to the next
11 speaker.

12 Next speaker will be Sammy. Please state your
13 name and affiliation for the record. I'm going to mute you
14 now.

15 SAMMY: Can you guys hear me?

16 MR. KELLEY: Yes.

17 SAMMY: Yeah. I'm going to keep it short.

18 I just want to say, you know, as we know, tire
19 rolling resistance basically means that the car is going to
20 perform a lot better, a lot more grip.

21 MR. RIDER: Sammy, it's really difficult to hear
22 you. So if you would move maybe closer to your microphone.

23 SAMMY: Can you guys hear me better now?

24 MR. RIDER: Way better. Thank you.

25 SAMMY: Hello?

1 MR. RIDER: Yes, we can hear you.

2 SAMMY: It's not coming --

3 MR. RIDER: Sammy, we can hear you.

4 (Pause)

5 Sammy? We can hear you. Maybe you cannot hear
6 us, but we can hear you. Or we could.

7 (Pause)

8 Sammy, we cannot hear you at this point. Why
9 don't you take a minute. Sammy, we'll come back to you.
10 We'll take the next commenter and then come right back to
11 you.

12 MR. KELLEY: All righty. Let's move to the next
13 speaker.

14 The next speaker is a telephone number ending in
15 070. Please state your name and affiliation. I'm unmuting
16 you now. Again, it's star six to unmute.

17 MR. ALBRIGHT: Can you hear me?

18 MR. KELLEY: Yes.

19 MR. ALBRIGHT: Okay. Thank you. This is the
20 third time around. This is Dick Albright again, and I
21 appreciate the opportunity here to comment on this, and I
22 appreciate the CEC for all the work that they do.

23 I do have some questions primarily from my little
24 note sheet here that only came to me over the last week as
25 to how this scientific method actually was engaged within

1 the judging criteria and, of course, the qualifications for
2 those. But there are other issues that have to do with the
3 commentary using words like violations and enforcement that
4 are keywords to the activities that we all react to.

5 The empirical testing that seems to have happened
6 has not engaged information regarding the offshore
7 manufacturers that I've seen. We have also weather and
8 temperature constants as to the variables that are required
9 for the method testing of the tires that are the original
10 equipment manufacturer-provided tires. The issues that
11 have to do with the qualifications of the manufacturing and
12 the industries is how this is going to affect all the
13 replacement tires, of course, and the lifespan of the
14 tires, as well as the surfacing of the roads that were
15 engaged in the testing, such as asphalt, concrete, the wet
16 road, dry road syndrome, and how skid testing was engaged,
17 timeline, distance, that sort of thing. We don't seem to
18 be able to engage properly in our investigation.

19 My background is 70 years as an industrial
20 designer and some aerospace and automotive experience along
21 those lines, as well as my degree in industrial design as
22 the fundamental and my time and place flying off a couple
23 of aircraft carriers.

24 That's primarily all I have to offer. I just
25 have those questions. Thank you very much for the time.

1 MR. RIDER: Thank you for your questions, Dick.

2 As a reminder, we have much more extensive
3 information in the rulemaking documents that are posted on
4 our website. Again, if you'd like to reach out with those
5 questions, the email on the slide is a great way to follow
6 up.

7 Can we try to unmute -- can we try Sammy again
8 before we move on to the next speaker?

9 MR. KELLEY: Yeah. Let me look in the attendees
10 list. Let's see.

11 MR. RIDER: Sammy, watch out. We're going to
12 unmute you, so be ready.

13 MR. KELLEY: Okay. I found Sammy.

14 Sammy, please state your name and affiliation for
15 the record. I'm unmuting you now.

16 MR. RIDER: Give it just one second. Just a
17 reminder to any folks that, you know, if you didn't, you
18 had technical difficulties, if we don't end up getting
19 Sammy unmuted, that you can make your comments in written
20 comment on the docket. Follow up that way.

21 Okay. Maybe let's move on to the next hand
22 raised.

23 MR. KELLEY: All righty. Let's move to the next
24 speaker.

25 The next speaker will be Jeremy Dunklin. Please

1 state your name and affiliation for the record. I'm
2 unmuting you now.

3 We can't hear you, Jeremy.

4 MR. DUNKLIN: Can you hear me now?

5 MR. KELLEY: Yes.

6 MR. RIDER: Yes, we can hear you.

7 MR. DUNKLIN: Great. Thanks. This is Jeremy
8 Dunklin with the Appliance Standards Awareness Project, or
9 ASAP. ASAP advocates for efficiency standards that cut
10 planet warming emissions and other air pollution, save
11 water, and reduce economic and environmental burdens for
12 low and moderate income households. ASAP's steering
13 committee includes representatives from environmental and
14 efficiency nonprofits, consumer groups, the utility sector,
15 and state government. We appreciate the opportunity to
16 participate in today's public workshop.

17 We strongly support the Commission's proposal for
18 replacement tires. This proposal would fulfill a 2003
19 state legislative mandate, one that is long overdue to
20 ensure replacement tires are as efficient as the original
21 equipment tires on new vehicles.

22 The proposed rolling resistance standards are a
23 big win for California drivers. Commission staff estimates
24 that drivers will save an average of \$179 to \$246 in fuel
25 costs over a lifetime of a single set of tires. By 2035,

1 those individual savings will add up to nearly \$1 billion
2 annually statewide. These cost savings are based on a
3 gasoline price of \$4.60 per gallon.

4 The benefits of this proposal extend beyond cost
5 savings. About 90 percent of the greenhouse gas emissions
6 associated with tires occur during the use phase, and the
7 proposed rolling resistance standards directly reduce these
8 emissions. In 2035 alone, the proposed standards would cut
9 annual greenhouse gas emissions by 2 million metric tons,
10 roughly the equivalent to removing 400,000 gasoline
11 vehicles from California roads. The standards would also
12 reduce harmful NOX and particulate matter emissions, air
13 pollutants that directly impact public health.

14 Crucially, efficiency gains from lower rolling
15 resistance do not come at the expense of safety or
16 longevity. The Commission's analysis finds no clear link
17 between rolling resistance and traction. In fact, tires
18 meeting the proposed Phase II standards have higher average
19 wet grip scores than non-compliant models in the testing
20 data. The proposal also includes the nation's first wet
21 grip standards, which would remove some of the worst
22 performing, least safe tires from the market. In addition
23 to wet grip, the Commission's analysis also showed no
24 apparent correlation between rolling resistance and dry
25 stopping distance, which was a concern raised earlier in

1 this meeting.

2 The Commission's analysis also showed no apparent
3 link between rolling resistance and longevity. Based on
4 the Treadwell data presented in the docket, tires meeting
5 the proposed Phase II requirements have average lifetimes
6 of over 50,000 miles, on par with tires that do not meet
7 the standards. The Commission has also proposed separate
8 product classes for longer life tires that would be subject
9 to less stringent standards, helping ensure that long life
10 tires remain available in the market.

11 We also want to recognize the quality of the work
12 that went into this proposal. Throughout the rulemaking
13 process, the Commission has been diligent, responsive to
14 industry feedback, and has refined the proposed standards
15 based on stakeholder input. The underlying technical
16 analysis is rigorous --

17 MR. RIDER: Thirty-second warning.

18 MR. DUNKLIN: -- drawing a large and
19 representative sample of tire testing, and the incremental
20 cost estimates are well grounded in established federal
21 rulemaking analysis.

22 For all these reasons, we urge the Commission to
23 move forward and properly finalize this rulemaking. We
24 will provide more details in our written comments. Thank
25 you.

1 MR. RIDER: Thank you, Jeremy.

2 This is the last call. That was the last in the
3 queue. Just give folks a moment to raise their hand if
4 they still intend. We'll give it about a minute, and then
5 we'll wrap up the hearing.

6 (Pause)

7 All right. Well, seeing no more comments, this
8 will conclude the hearing.

9 I want to just thank participants again for
10 listening in and for all those who commented. Thank you
11 very much for your comments.

12 As just one last reminder, we look forward to
13 also reviewing along with these comments today the written
14 comments that are due next week.

15 Thank you once more, and I hope you have a great
16 rest of your day.

17 (The hearing adjourned at 12:14 p.m.)

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