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California Energy Commission
Docket Unit
1516 Ninth Street, MS-4
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To whom it may concern:

My name is Barry Smith. I am a retired tire engineer. I own and operate the website Barry's Tire Tech (www.barrystiretech.com), where I try to explain how tires do what they do. This includes articles about testing, construction, - and what this letter is about – government regulations.

Just for the record, I am not a resident of California. I am merely a very interested by-stander.

I became aware of the California Energy Commission in 2010 when I was researching tire rolling resistance for an article I was writing and stumbled across the Smithers' testing performed for the commission in 2007. Here's an archived version: 2007 Smither's CEC Testing – archived . I wrote about it here: Barry's Tire Tech – Followup on Rolling Resistance

First, I want to complement the CEC for their collaborative approach. This is the way government should be.

I also want to point out the contribution of the US Tire Manufacturers Association, Discount Tire, and Smithers as pivotal towards the future success of this project.

Please be aware that whatever it is that the CEC decides to do, it is setting a precedent for the rest of the world to follow.

However, I must point out a problem on the horizon: As John Baldwin of Discount Tire stated in his June 18, 2026 letter to the commission: " …. if the Phase 2 requirements beginning in 2031 were applied to the tires we sell in California today, roughly 70 percent of currently available options would be removed from the market. ……"

This lines up not only with my own, admittedly crude, calculations, but also with statements made by the US Tire Manufacturers Association (USTMA) when the first proposal was made in 2023. If true, this would clearly be an unacceptable situation.

To address this concern, I suggest that encouraging improvement would be more productive than merely banning tires with specific values. To accomplish this:

- Temporarily suspend plans to place limits on rolling resistance values.
- Create the TRRED database and populate it for – say - a year.
- Make the database available to the public and downloadable.
- After the database has been populated, ask the stakeholders to analyze the TRRED data.
    - Not only would this encourage the natural market forces to pressure the manufacturers to make improvements in their products, but would put those brand owners at the deep end on notice of their need to do something substantial.

Obviously, this means, in the short term, not complying with AB844. Also, it is possible the goals of AB844 are not achievable. However, improvements are always possible.

I am sure there is enough expertise available to do a deep enough analysis to be meaningful and credible. I point to Discount Tire, the USTMA, and Smithers as suitable locations where this expertise can be found.

Not only would this method make things better for California residents, it wouldn't unnecessarily burden the manufacturers. In particular it would further the current collaborative environment the CEC has so carefully set up.

Thank you for the opportunity to present my comments.

Barry Smith

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