

DOCKETED	
Docket Number:	26-TIRE-01
Project Title:	Tire Efficiency Rulemaking
TN #:	271707
Document Title:	Kevin C Brown Comments - Consumer Choice has to include Safety
Description:	N/A
Filer:	System
Organization:	Kevin C Brown
Submitter Role:	Public
Submission Date:	7/29/2026 11:36:10 AM
Docketed Date:	7/29/2026

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Submitted On: 7/29/2026
Docket Number: 26-TIRE-01*

Consumer Choice has to include Safety

Hi there Tire Efficiency Rulemaking Commission - As a materials science engineer myself :-), and long-time driver, I appreciate the Commission's effort to improve energy efficiency while also incorporating wet-grip performance requirements. However, tires are inherently multi-objective engineering products. Consumers often choose replacement tires based on a balance of braking, traction, handling, durability, ride quality, climate, and efficiency.

In many cases, drivers intentionally choose replacement tiresâ€”such as modestly wider tires that remain within manufacturer-approved fitment rangesâ€”to prioritize improved traction, braking, and overall vehicle control over achieving the lowest possible rolling resistance. Regulations should not unnecessarily eliminate these legitimate, safety-oriented choices.

I encourage the Commission to ensure the final rule fulfills its stated goal of preserving consumer choice by allowing safe replacement tires that represent different engineering tradeoffs, rather than optimizing primarily for rolling resistance alone.

Thank you,
Kevin.