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Bridgestone Comments on CEC Revised Proposal

Additional submitted attachment is included below.

Bridgestone Americas, Inc.
200 4th Avenue South
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August 3, 2026

California Energy Commission
Docket Unit
Docket No. 26-TIRE-01
715 P Street, MS-4
Sacramento, CA 95814

RE: Additional Comments on Tire Efficiency Rulemaking (Docket No. 26-TIRE-01)

I. Introduction and Overview

Bridgestone Americas Tire Operations, LLC ("Bridgestone" or "the Company") welcomes the opportunity to provide additional comments in response to the California Energy Commission's (CEC's) Notice for Additional Public Comment and Summary of Changes on its Proposed Replacement Tire Efficiency Program (Docket No. 26-Tire-01, July 17, 2026).

Bridgestone submitted initial comments on June 16, 2026 (TN #270652) addressing applicability, timeline, compliance margin, reporting and enforcement. CEC was directly responsive to most of Bridgestone's comments in its Revised Proposal. The Company greatly appreciates CEC's careful consideration of those comments, as well as its continued collaboration with industry stakeholders throughout the rulemaking process. There remain a few items where Bridgestone believes additional clarity or revisions would be helpful.

Bridgestone respectfully requests that CEC consider the following points to ensure that the Replacement Tire Efficiency Program is both achievable and delivers meaningful benefits to all stakeholders.

II. Testing Specifications for LT

In the Revised Proposal, section 3033(f) was revised to include "for a light truck or commercial replacement tires, the test method procedures to determine the UTQG treadwear shall be 49 Code of Federal Regulations part 575.104(e)…" Bridgestone requests that CEC remove this section as the scope of the UTQG regulation is passenger car tires. (§575.104(a) Scope). The Company understands that CEC was attempting to have a verification method for “ultra long-life” and “long- life” for light truck and commercial replacement tires; however, the tire industry has never been required to test these tires for UTQG treadwear, and thus, this would create a de facto change to the federal regulations. Bridgestone recommends that by removing this, CEC only allow the “ultra long lasting” and “long lasting” definitions apply to passenger car tires.

III. Compliance Margin

The Revised Proposal's introduction of a two-standard-deviation framework in Section 3309(d)(1)(B) is a meaningful step toward incorporating measurement uncertainty into the enforcement framework. Under this framework, Commission staff will proceed to enforcement only where testing results exceed the declared RRC value by more than two standard deviations, or where wet grip results fall more than two standard deviations below 1.0.

The 2-SD framework depends on the standard deviation of test results for a specific tire, which can vary across products, making the resulting tolerance less predictable from one product to the next. A fixed numerical tolerance, such as the 0.3 N/kN threshold for RRC and 0.03 for wet grip index G specified in UNECE Regulation 117 and EU 2020/740, offers a clear, predictable standard that does not fluctuate with product-specific variability.

IV. Conclusion

Bridgestone appreciates the opportunity to provide feedback on the California Energy Commission’s (CEC) Proposed Tire Efficiency Program. The Company encourages CEC to consider these refinements to the Revised Proposal. By integrating previous industry feedback from the initial comment period into the revised draft regulation, CEC has drafted a fuel efficiency program that is technically feasible—albeit challenging—and that advances energy efficiency goals while preserving safety, performance, and innovation within the tire industry.

Sincerely,

Nicole Avramovich
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