

DOCKETED

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*Comment Received From: Daniel Ingber
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SEMA Comments

SEMA Comments on CEC Data & Information Collection for the Replacement Tire Efficiency Program

Additional submitted attachment is included below.

March 11, 2021

California Energy Commission
Docket Unit, MS-4
Docket No. 20-TIRE-01
1516 Ninth Street
Sacramento, California 95814-5512

Filed electronically: <https://efiling.energy.ca.gov/>

Re: Docket Number 20-TIRE-01: Data & Information Collection
for the Replacement Tire Efficiency Program

Dear Sir/Madam:

The Specialty Equipment Market Association (SEMA) appreciates this opportunity to provide comments to the California Energy Commission (CEC) as part of the agency's mission to gather data and information regarding tire efficiency.

SEMA represents the \$46 billion specialty automotive industry comprised of 7,500 mostly small businesses nationwide, including 1,405 in California, that manufacture, retail, and distribute custom parts and accessories for motor vehicles. The industry produces performance, restoration, and enhancement parts for use on passenger cars and trucks, collector vehicles, racecars, and off-highway vehicles. Products range from tires and wheels to engines, exhaust systems, lighting equipment, suspensions, truck caps, leather seating, mobile electronics, and more.

SEMA worked with California lawmakers in 2003 to define the scope of the "Replacement Tire Efficiency Program" (AB 844), which largely applies to mass-produced passenger and light-duty truck tires. Lawmakers provided an exemption to five categories of tires including tires with the same SKU, plant, and year in volumes of 15,000 or less annually, along with several other categories. The AB 844 exemptions apply to most specialty tires marketed by SEMA members. SEMA's comments are generally limited to issues applicable to this category.

Nearly 18 years have passed since the law was enacted and there have been some marketplace changes that should be noted. Of primary interest, it should be reinforced that the program is a consumer awareness initiative and not a mechanism for removing consumer choice.

Consumers have a range of options to consider when selecting a replacement tire. Basic tire characteristics include traction, wear, rolling resistance, comfort, cost, mass, and noise. There is no option for achieving the best results for "all of the above." Rather, it is a balancing act in which an emphasis on one or two qualities may impact other characteristics. California's diverse weather and geographical conditions underscore the importance of making sure consumers always have the right to select tires most appropriate for their needs.

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Since 2003, the fuel economy gains for vehicle fleets have risen significantly and are on-track to rise dramatically more in the coming years. The automakers are using every tool available to make their vehicles as fuel-efficient as possible. This includes installing tires that are generally more rolling efficient while addressing other consumer needs. It is useful to make this observation since consumers may desire to emphasize other tire characteristics for their driving needs when selecting a replacement tire, such as wet traction, handling, or mileage. If the CEC decides to establish minimum efficiency standards for replacement tires, it should remember original equipment tires may already exceed such minimum standards to help achieve fleet Corporate Average Fuel Economy (CAFE) Standards.

While the 2003 law seeks to address one aspect of tire efficiency, an emphasis should also be placed on reminding consumers to monitor tire inflation, check tire alignment, and rotate their tires. The fuel economy benefits from addressing those issues may ultimately far exceed the positive impact of a replacement tire efficiency program.

Thank you for this opportunity to provide comments on the CEC's information gathering initiative. Feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Ingber', with a long horizontal flourish extending to the right.

Daniel Ingber
Vice President, Government and Legal Affairs
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