

DOCKETED

Docket Number:	20-TIRE-01
Project Title:	Tire Efficiency Order Instituting Information Proceeding
TN #:	249052
Document Title:	California Autobody Association Comments - on Tire Regulations
Description:	N/A
Filer:	System
Organization:	California Autobody Association
Submitter Role:	Public
Submission Date:	3/6/2023 2:28:41 PM
Docketed Date:	3/6/2023

*Comment Received From: Rick Johnson
Submitted On: 3/6/2023
Docket Number: 20-TIRE-01*

Tire Regulations Comments

Letter

Additional submitted attachment is included below.



March 6, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Replacement Tire Efficiency regulations

On behalf of the California Autobody Association (CAA), we are writing to provide comments to the California Energy Commission proposed Replacement Tire Efficiency regulations. The CAA is a non-profit automotive trade association comprised of approximately 1,000 individual and independent repair businesses within the collision repair industry.

Auto body and collision repair facilities are automotive repair dealers who perform repairs or reconstruction of automobile or truck bodies, structures or frames. While performing such collision repairs it may be necessary to replace a damaged wheel and tire as part of the repair.

The auto body repair business is not in the primary business of selling tires to the general public but will locate a replacement tire to match the damaged tire as part of the collision repair. Consumers do not go to auto body shops to buy a set of new set of replacement tires. Consumers go to auto body repair facilities because of a vehicle accident and wish to have collision damage repaired. The auto body dealer is not a "tire dealer" or "tire retailer" as contemplated by these regulations. It would be unreasonable to expect an auto body repair shop to meet the proposed regulation requirements.

As such, we respectfully request that auto body repair facilities be exempted from these regulations or alternatively, revise the definition of tire dealer to focus on automotive repair dealers that primarily sell tires to consumers.

Thank you for your consideration.

Sincerely,

Rick Johnson
Executive Director

A handwritten signature in black ink, appearing to read 'Rick Johnson', is written below the typed name and title.