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Description:	The Tire Industry Association (TIA) is submitting these comments on behalf of its members in response to the California Energy Commission's draft framework of California's replacement tire efficiency program. TIA has 1,102 members in the state of California.
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March 23, 2023

**DRAFT FRAMEWORK OF CALIFORNIA'S REPLACEMENT TIRE EFFICENCY
PROGRAM**

Docket #: 20-TIRE-01

Project Title: Tire Efficiency Order Instituting Information Proceeding

California Energy Commission

Docket Unit, MS-4

Docket No. 20-TIRE-01

1516 Ninth Street

Sacramento, California 95814-5512

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**TIA Comments in Response to Draft Framework of California's Replacement Tire
Efficiency Program**

Assembly Bill (AB) 844 (Nation, Chapter 645, Statutes of 2003) directs the California Energy Commission to adopt a Replacement Tire Efficiency Program to ensure replacement tires for passenger cars and light-duty trucks sold in California are at least as energy-efficient as the tires sold as original equipment on new vehicles.

Implementation of the program requires the adoption of a regulation, which CEC will develop through a rulemaking. CEC staff intends to request that the Commission consider an order initiating a rulemaking proceeding following the publication of this report.

The Tire Industry Association (TIA) is submitting these comments on behalf of its members in response to the California Energy Commission's draft framework of California's replacement tire efficiency program.



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The Tire Industry Association is an international non-profit association representing all segments of the tire industry, including companies that manufacture, repair, recycle, sell, service or use new or retreaded tires, and also those suppliers or individuals who furnish equipment, material or services to the industry.

The mission of TIA is to promote tire safety through training and education, to act as the principal advocate in government affairs and to enhance the image and professionalism of the industry so that our member businesses may be more successful. TIA has more than 13,000 members from all 50 states and around the globe.

TIA has 1,102 members in the state of California. As the industry leader in tire service technician training, TIA has trained and/or certified more than 180,000 people since 1997.

TIA will provide comments on standards and testing, tire marketplace, and consumer choice. TIA will pose questions and concerns to the CEC based on text in the draft framework.

Our 1,102 members in the state of California are collectively concerned over the draft framework and have offered us their feedback and concerns that are reflected in our comments.

As we gather more data and feedback from our members on these topics, we hope to have follow-up conversations with the CEC to provide more information on the following questions.

Below we have shared our concerns with certain proposals or statements in the draft framework and have responded or posed questions to the agency based on the text.

EXECUTIVE SUMMARY TIA RESPONSE

CEC Proposal/Statement: The proposed minimum standards would apply to the sale of new replacement tires starting with those sold on or after January 1, 2026, with a more stringent level coming into effect two years later in 2028. *(Page 1)*

TIA Response: Many tire dealers in California keep a substantial inventory of tires to meet consumer demands. Questions for the CEC to consider: What do tire dealers do with existing inventory that doesn't meet the standard on January 1, 2026? Will dealers be allowed to sell this existing inventory? Will more stringent levels involve fines and penalties? Will there be a warning system? What will be the enforcement mechanism from the CEC to ensure compliance? TIA advocates for a warning system to tire dealers before fines are issued to ensure compliance.

CEC Proposal/Statement: Along with a minimum performance standard, CEC staff proposes a tire rating system for the fuel efficiency and peak wet traction of tire models, which will allow consumers to easily compare tire efficiency, safety, and other attributes. *(Page 1)*



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TIA Response: Questions for CEC to consider: How will the new tire rating system be communicated to consumers if it does not reflect the UTQG ratings on all tires?

CEC Proposal/Statement: CEC staff's proposed regulation proposes an additional traction rating, a provisional peak wet traction rating, that would better indicate a tire's ability to stop on wet pavement for vehicles equipped with modern braking and handling systems. *(Page 2)*

TIA Response: Question for the CEC to consider: Are the tire manufacturers going to create special traction ratings for tires sold in CA?

CEC Proposal/Statement: CEC staff estimates the proposed regulations would increase the cost of replacement tires by \$1 per tire in 2026 to meet the initial standard levels. *(Page 2)*

TIA Response: TIA believes this cost to be substantially higher based on the tire market in California. According to Quartix Inc in 2021, "Although low rolling resistance tires can improve a vehicle's fuel economy around 3-10%, they are around 50% more expensive than standard tires. Such tires are therefore an upfront investment that (hopefully) pays for itself over time."

Staff Proposed Regulatory Framework

CEC Proposal/Statement: No other U.S. jurisdiction requires reporting rolling resistance and peak wet traction, although the National Highway Transportation Safety Administration has adopted test methods within its federal Tire Fuel Efficiency Consumer Information program. *(Page 7-8)*

TIA Response: If no other jurisdictions require this, TIA believes this will severely limit options for tire purchases by California consumers. The NHTSA test methods mentioned are from 2010 and only address test methods. NHTSA should have the opportunity to update their test methods and comment on low rolling resistance before a California regulation is implemented.

CEC Proposal/Statement: A manufacturer would be required to exercise due care in certifying its tires. This framework would make reporting under the CEC's program like reporting under the pending federal Tire Fuel Efficiency Consumer Information Program. *(Page 8)*

TIA Response: The pending federal Tire Fuel Efficiency Consumer Information Program would require manufacturers to submit low rolling resistance ratings, so they would not have a choice. California has no regulatory authority to require submission other than the ability to sell in California. TIA believes some tire manufacturers may choose to opt out of California, giving



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consumers fewer choices. What will the regulation look like with regards to the penalties for inaccurate reporting when it isn't covered by an FMVSS?

CEC Proposal/Statement: Tire retailers would be required to display information that is conspicuous and “readily accessible” about the energy efficiency tire rating system, including a web address and quick response code (QR code) linking to the CEC’s website for specific tire and related information. Physical tire retailers would additionally be required to provide, upon request, a disclosure of the specific ratings for tires being considered. *(Page 8)*

TIA Response: Will display information be provided by the CEC? How will retailers have to display the information? How does CEC define conspicuous and readily available? What will be the enforcement and penalties? Will the CEC be initiating an awareness campaign? TIA would advocate for a warning system before any fines are issued to ensure full compliance. In regard to requiring a disclosure of specific ratings of tires upon request, this may be requiring dealers to disclose information or ratings that do not exist.

Cost-Effectiveness Analysis

CEC Proposal/Statement: Staff examined the costs of several tires in the market and did not find a relationship between tire rolling resistance and purchase cost. *(Page 8)*

TIA Response: Market data suggests that tires rated low rolling resistance general cost more than traditional all-season tires. According to Clean Fleet Report, “LRR tires tend to be a bit more expensive than their all-season counterparts.” According to Tuckinginfo.com, “Generally speaking, LRR tires are presumed to cost about 15% more than standard tires.” Mike Roeth, Executive Director at NACFE, also acknowledged that “upfront costs of low rolling resistance tires may be higher.”

CEC Proposal/Statement: The savings are much larger than the \$44 and \$66 (respective of 7 and 11 rolling resistance coefficient) estimated incremental cost for the set of tires, with a payback at roughly 2,200 miles traveled, or based on 12,000 miles traveled in a year a payback of just more than two months. *(Page 9)*

TIA Response: This previous statement is inconsistent with previously stated saving from the draft framework. TIA believes the saving will be much less. The U.S. Department of Energy has done research that shows that utilizing low rolling resistance tires can have as much as a 10% fuel savings impact for drivers. However, Bridgestone argues in more recent studies, that for most drivers, the fuel savings is around 3%.



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Economic and Fiscal Analysis

CEC Proposal/Statement: These effects are the result of the least efficient tire models being dropped and the likelihood that new more efficient models will come into the market. *(Page 11)*

TIA Response: TIA believes this will result in California tire retailers and consumers having limited tire options when purchasing. TIA believes tire manufacturers will not develop new tire models for California if the demand is not present in the other 49 states. USTMA members will comply with new regulations, but TIA has concerns that offshore brands can self-certify as low rolling resistance tires, dump tires that are not low rolling resistance in California without the policing and enforcement. This will consequently harm the companies that manufacture tires in the U.S. and the California tire dealers that comply with the regulation by only selling approved tires.

CEC Proposal/Statement: California maintains the highest vehicle registration count in the nation, and providing products that meet regulations and consumer needs has been demonstrated to be important to manufacturers from many different product sectors. *(Page 11)*

TIA Response: TIA believes tire manufacturers will not change anything from a manufacturing standpoint, but rather discontinue selling certain tire lines and brands in California. The impact of this would be the reduction in lower cost economy and private brand tires resulting in less choice for the tire dealer and ultimately the consumer.

Consumer Equity

CEC Proposal/Statement: In its research, staff found incremental costs range from negligible to approximately \$11 per tire (not adjusted for inflation). *(Page 12)*

TIA Response: In order to illustrate the price differences between tires with LRR features and standard all-season performance, TIA checked the most popular car, SUV, truck and van for the state of California.

While the 2017 Honda Civic has the highest number of registrations, there are 4 different tires for that particular vehicle depending on the sub-model, 2 different tires for the 2018 Toyota RAV4, 4 different tires for the 2017 Toyota Tacoma and 2 different tires for the 2004 Toyota Sienna. For each tire size, TIA used the leading online tire retailer, Tire Rack, to demonstrate the actual difference in cost to the consumer. Tire Rack has search criteria that includes “Eco Focus” to identify tires with low rolling resistance and fuel economy features while the remaining tires were described as “Without Eco Focus” or “Non-Eco” for purposes of this table.



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Vehicle	Sub-Model	OE Tire Size	Tire Type	Lowest Cost	Highest Cost
2017 Honda Civic Sedan	EX	215/55R16 93 H	Eco Focus (12) Non-Eco (46)	\$125.99 \$105.99	\$229.36 \$217.38
2017 Honda Civic Coupe	EX-L	215/50R17 91 H	Eco Focus (23) Non-Eco (59)	\$142.99 \$98.73	\$264.22 \$228.99
2017 Honda Civic Sedan	SI	235/40R18 91W	Eco Focus (14) Non-Eco (69)	\$148.99 \$115.45	\$288.99 \$279.74
2017 Honda Civic	Type R	245/30ZR20 90Y XL	Eco Focus (5) Non-Eco (19)	\$344.99 \$192.37	\$444.99 \$436.99
2018 Toyota RAV4 AWD	LE	225/65R17 102H	Eco Focus (23) Non-Eco (71)	\$137.51 \$119.78	\$300.59 \$318.67
2018 Toyota RAV4 AWD	Limited	235/55R18 100H	Eco Focus (25) Non-Eco (74)	\$141.30 \$136.18	\$289.20 \$250.99
2017 Toyota Tacoma		245/75R16 109S 245/75R16 111T	Eco Focus (3) Non-Eco (60)	\$165.57 \$149.86	\$251.99 \$245.99
2017 Toyota Tacoma		265/70R16 112T	Eco Focus (2) Non-Eco (45)	\$254.99 \$162.40	\$254.99 \$211.99
2017 Toyota Tacoma		265/65R17 110S	Eco Focus (6) Non-Eco (45)	\$261.37 \$180.39	\$276.99 \$264.76
2017 Toyota Tacoma		265/60R18 109H	Eco Focus (18) Non-Eco (69)	\$210.99 \$171.04	\$279.99 \$274.99
2004 Toyota Sienna FWD	XLE	215/65R16 98H	Eco Focus (17) Non-Eco (47)	\$115.99 \$113.25	\$194.57 \$157.11
2004 Toyota Sienna FWD	LE	225/60R17 99H	Eco Focus (16) Non-Eco (66)	\$142.99 \$118.65	\$236.29 \$229.99
Average			<i>Eco-Focus (14)</i> <i>Non-Eco (56)</i>	<i>\$182.81</i> <i>\$138.68</i>	<i>\$276.01</i> <i>\$259.80</i>



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The four most common vehicles in California represent 12 different tire sizes depending on the sub-model. On average, California consumers would have an average of 14 options that are marketed as fuel efficient and 56 tires that would be “illegal” to sell and install. For pickup trucks in particular, the options are even fewer and the cost difference higher in some instances. Overall, the eco focus tires averaged \$44.13 higher than the tires without any eco focus on the low end of the price scale, which would reflect a total cost that is \$176.52 higher if consumers are limited to tires that fit in the eco focus category.

Admittedly, this data is anecdotal, but TIA believes it clearly demonstrates how limited options for fuel efficient tires lead to higher costs for consumers, especially those on the lower end of the economic scale. Safety should be the primary focus and the non-eco options on Tire Rack for the most popular vehicles in California are more affordable and a much better alternative to used tires. Tire Rack does not represent all of the options that are available to consumers, but it does provide some valuable insight into the problems associated with limiting consumer choice. In this example, choices would expect to be even further limited because the eco-focus designation is not based on any test results so of the tires labeled eco-focus may not qualify under California regulations.

CEC Proposal/Statement: Staff estimates the annual per-vehicle savings to be about \$215 for a set of four compliant tires. *(Page 12)*

TIA Response: TIA believes that the annual saving will be much less based on industry research. According to Consumer Reports, savings add up to about \$70 per year, or about \$360 over the life of a set of tires (62,000 miles for a performance all-season tire, based on CR testing). This savings calculation is based on gas at \$5 per gallon. Clean Fleet Report estimates that savings are between \$57 to \$126 per year.

CEC Proposal/Statement: Overall, the purchase power and ability for low-income customers to maintain their vehicles properly will be improved by a decrease in lifetime fiscal burden from more efficient tires. *(Page 12)*

TIA Response: Low-income consumers purchase new tires based on price and have no interest in fuel economy when the alternative is a used tire. Tires are purchased one, two, or three at a time based on need so they are often unplanned expenses for consumers on a tight budget.

CEC Proposal/Statement: However, should the incremental cost of efficient tires cause the purchase price to increase significantly, these consumers most sensitive to price may defer or delay the replacement of worn or damaged tires. *(Page 12)*



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TIA Response: TIA believes this could also be implied to include select used tires. This could create a huge market for used tires in California because they would not be covered as a replacement tire.

CEC Proposal/Statement: Importantly, properly targeted incentives and rebates for lower-income consumers should help address potential postponement due to the higher purchase price of efficient tires. *(Page 12)*

TIA Response: Early CEC text suggested it was only \$1 so a \$4 rebate is unlikely to affect postponement.

CEC Proposal/Statement: Staff maintains that the overall cost saving throughout the life of the replacement tires will contribute to the financial wellbeing for low-income consumers, and safety may be improved by all consumers being able to use the cost savings from the regulations. *(Page 12-13)*

TIA Response: TIA questions how safety is improved by cost savings.

CHAPTER 1: Program Overview and Policy Background

CEC Proposal/Statement: The consultants estimate, in theory, California could save approximately 300 million gallons of gasoline annually by using low-rolling resistant tires. *(Page 19)*

TIA Response: According to the U.S. Energy Information Administration, in 2021, about 134.83 billion gallons (or about 3.21 billion barrels) of finished motor gasoline were consumed in the United States, an average of about 369 million gallons per day (or about 8.80 million barrels per day). This was about 6% less than the record high level of consumption of nearly 392 million gallons per day in 2018. Given that gasoline is the most consumed petroleum product in the United States, the estimated savings of 300 million gallons is minimal given that the U.S. consumes more than this in a single day.

AB 844

CEC Proposal/Statement: The first is that compared with OE tires, replacement tires are on average about 20 percent less energy-efficient. *(Page 19)*

TIA Response: Questions for the CEC to consider: Is the CEC comparing non-OE tires to OE tires? Or is the CEC comparing the OE tire to the same replacement model tire? Each scenario will develop different results.



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CEC Proposal/Statement: (Several exemptions including...) Tires manufactured specifically for use in an off-road motorized recreational vehicle. *(Page 20)*

TIA Response: TIA is concerned that certain off-road pickup, jeep, or SUV's would not be exempt because they are not legally classified as recreational vehicles. These vehicles may have tires specific for off-road capability and used by a consumer on both street legal and off-road applications.

SmartWay Program

CEC Proposal/Statement: Initial discussions with tire retailers revealed that the SmartWay program is an understandable tire efficiency program used for tractor-trailer trucks that may be a model for a passenger vehicle tire program. *(Page 24)*

TIA Response: TIA believes the SmartWay program is effective because a list of "approved" tires is easy to understand and it preserves consumer choice.

CHAPTER 3: Lack of Consumer Information on Tire Efficiency

Consumer Decision Making on Which Tires to Purchase and Industry Influence

CEC Proposal/Statement: Consumer Report's members clearly valued all-weather grip, which perform well in a range of road conditions (dry, wet, icy, etc.). The survey also revealed that tire brand was important in their decision making. However, one of the most common reasons members cited for choosing a specific tire brand was price. Other top considerations include handling, treadwear warranty, quietness and wet grip. Fuel efficiency was not included on the list. However, if information was readily available on tire efficiency and the related financial impact over the life of the tire, it's reasonable to conclude that tire efficiency would be included as an important consideration for purchasing replacement tires. *(Page 39)*

TIA Response: TIA research has also shown that price is a major factor in tire purchases and that low rolling resistance tires are much higher in price than a low-cost offshore all season tire. Most consumers are not concerned with fuel efficiency, especially low-income consumers. The motorist most likely to see a direct correlation between tire efficiency and distance is the electric vehicle owner that will see less range when a standard all-season tire replaces a low rolling resistance tire. There is also no consumer research available concluding that tire efficiency would be included as an important consideration for purchasing replacement tires.



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CHAPTER 4: Staff's Proposed Regulatory Framework**Scope**

CEC Proposal/Statement: Staff's proposed regulations would apply to all tire retailers, manufacturers, and tire brand name owners of any new tire that is sold or offered for sale in California that is designed to replace a tire sold with a new passenger car or light-duty truck. *(Page 46)*

TIA Response: TIA is concerned that because this regulation only applies to the sale of new tires, that consumers will seek used tires as an alternative. Used tires are except from the regulation so many consumers will seek a used tire as a cost saving alternative. These used tires are in most cases not low rolling resistance tires. TIA expects this regulation to increase the used tire market significantly as demand for used tires will rise with these regulations only applying to the sale of new tires. With demand for used tires rising as a result, California could be forced to deal with unsafe used tires being imported into the state for sale and ending up on California roads.

"Tire Retailers" Subject to Staff's Proposed Regulations

CEC Proposal/Statement: This definition is intended to apply to all places where customers may purchase tires, including internet and mail order companies, tire dealers, manufacturer outlets, or retail department stores. *(Page 49)*

TIA Response: As a result of this regulation, some online retailers may choose to stop offering their products in California. This will limit consumer choice and drive-up prices in the state with fewer outlets offering tires.

Data Subject to Collection Under Staff's Proposed Regulations

CEC Proposal/Statement: Staff intends to require tire manufacturers to report the suggested retail price of each replacement tire to allow staff to ensure that minimum rolling resistance standards remain cost-effective, consistent with AB 844. *(Page 52)*

TIA Response: Questions for CEC to consider: Will the report be for just low rolling resistance tires or all tires in the California market? Or will it include offshore tire manufacturers and private brands?



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Testing Procedures

Testing Procedure for Peak Traction Coefficient

CEC Proposal/Statement: Staff recommends aligning with the federal test conditions and procedures, thus creating a single testing standard under both the state and federal programs. (Page 54)

TIA Response: TIA believes there must be one standard for federal and state.

CHAPTER 8: Savings and Cost Analysis

Equipment/Tire Purchase Costs

CEC Proposal/Statement: For example, the Tires and Passenger Vehicle Fuel Economy report shows improvement can be made for less than \$0.50 (2006 dollars); so without any markup, a theoretical \$100.00 tire would become a \$100.50 tire. However, such a small increase would easily be overshadowed by other market factors. The analysis of retail price and rolling resistance shows no correlation for the most recent CEC test data; nor has it shown correlation in any of the other reviewed studies from the past. CEC staff assumes that the incremental manufacturing cost to produce more efficient tires is small, but it does not mean that it is zero. (Page 74)

TIA Response: TIA believes this information to be outdated and that more accurate and current studies should be cited.

CHAPTER 10: Economic and Fiscal Impacts

Business Creation and Elimination

CEC Proposal/Statement: Tire retailers will likely see impacts from both increases and decreases in specific tire model lines. These impacts are the result of the least efficient tire models being dropped and the likelihood that new, more efficient models will come into the market. However, overall, the demand for new tires will remain the same as it is driven by road wear and VMT. Therefore, the existing retail environment would remain appropriately sized for the volume of tires needed post regulation. (Page 90)

TIA Response: TIA believes this statement suggests that consumer choice will be limited to the tires that CEC determines to be efficient enough for California. This will also drive-up demand



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for used tires as consumers on a budget seek will seek more affordable alternatives to higher priced low rolling resistance tires.

Business Advantages and Disadvantages

CEC Proposal/Statement: In other words, whether a business was located in California or offering tires to Californians from out of state, the rules would apply equally. Simultaneously, distributors located within the state but offering and shipping tires to other states or countries would be able to continue shipping tires through the state even if they were not allowed to sell them to consumers within the state. *(Page 90)*

TIA Response: These rules would not apply to businesses that sell used tires. Many used tires will be imported into California as a result. Questions for the CEC to consider: Would the regulation allow consumers to purchase tires out of state and have them mounted in state? Would it be illegal for a California tire dealer to mount new tires (that they didn't sell) that are not on the approved list?

CEC Proposal/Statement: There are possible inequities that could occur in the border regions of the state, where Californian consumers could reasonably seek a tire in an unregulated jurisdiction without great inconvenience. However, the CEC does not expect this to create a major disadvantage both because the California retailers will be able to offer a strong selection of similarly priced tires and because the areas that this occur are generally sparsely populated. *(Page 90)*

TIA Response: The small businesses on the border will suffer in addition to law abiding tire dealers in the cities. The regulations could create a market for low-cost new tires not allowed for sale in California. Scenario for CEC to consider: A consumer does not buy the tire from the business registered in California but from an out-of-state company. Then a tire dealer in California mounts the tires purchased from out-of-state. Some will take advantage of the law by purchasing tires out-of-state and having them delivered to California where they are mounted.

CHAPTER 11: Consumer Equity

Fiscal Impacts, Affordability, and Cost

CEC Proposal/Statement: Higher purchase prices for efficient tires may burden low-income consumers and could deter or delay them from purchasing replacement tires. *(Page 93)*

TIA Response: TIA believes this would in fact burden low-income consumers and will deter or delay from purchasing or push them to them to the used tire market which is not regulated.



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§ 3309: Retail Disclosures

CEC Proposal/Statement: Each physical retail location must prominently display at least one California replacement tire sign so as to render the sign likely to be seen, read, and understood by an ordinary individual under customary conditions at the time the tire retailer, as defined in section 3302 of this Article, conveys or displays the price of any replacement tire at a physical retail location. The location of the California replacement tire sign shall be accessible within arm's length of the accessible location. (A-27)

TIA Response: TIA is concerned with what tire dealers will be required to display. In addition, TIA has concerns that the sign could potentially be burdensome, restrictive, and inoperable for both the tire dealer and consumer. It may be difficult for the information to be easily seen and understood by the consumer. Questions for the CEC to consider: What will be the enforcement mechanisms? Is there a specific measurement for arm's length? If a retail location has three separate sales counters, will each counter need a sign? What about if it is one long counter with three registers? Will a retailer be fined for having the correct sign but in the wrong location? TIA advocates for a warning system to tire dealers before fines are issued to ensure compliance.

CEC Proposal/Statement: The Tire Energy Efficiency Disclosure shall display at least the tire brand name, tire model name, tire size, Energy Commission rolling resistance star rating, UTQG treadwear and traction rating, the peak traction rating, the operating cost calculated according to subsection (f) of this section, and a QR code linking to the Energy Commission's TRRED Replacement Tire Efficiency Program search page. (Pages A-27, A-28)

TIA Response: Questions for the CEC to consider: Who will develop the Energy Commission rolling resistance star rating (CEC, tire manufacturers, or the tire retailer)?

CEC Proposal/Statement: Any webpage that displays the price of one or more replacement tires sold or offered for sale in California shall also prominently display, concurrent with the price, the efficiency star rating for the replacement tire and a clearly marked hyperlink to Energy Commission's TRRED webpage that displays the information for the specific replacement tire. For purposes of this section, this information is not prominently displayed if the purchaser must search for it in the general content of the website. (Page A-28)

TIA Response: TIA is concerned that many online tire retailers would have to redesign their website in order to comply. This could cause some online tire retailers to cease business in California causing fewer tire options in the marketplace and higher prices for consumers.



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In closing, rather than passing burdensome regulations, California could improve energy-efficiency and decrease fuel consumption by educating consumers about proper tire maintenance. TIA believes that properly inflated tires last longer, increase fuel economy, and are safer. According to the U.S. Department of Energy, keeping your tires properly inflated, can improve gas mileage by 0.6% on average, and up to 3%.

TireBuyer.com explains, that a tire with a recommended pressure of 35 psi that's only inflated to 28 psi will increase its rolling resistance by 12.5%, putting a serious dent in the fuel budget, and counteracting everything to be gained by low rolling resistance tire technology. According to Continental Tire, "A properly inflated tire delivers 1% better fuel economy compared to a tire that is just 10% underinflated."

TIA is continuing to gather data on these topics and will provide additional information to the Commission when appropriate. Please do not hesitate to contact TIA for further information and feedback from our members.

We welcome the opportunity to meet with the California Energy Commission as we proceed to share the impact that a potential proposal will have on a variety of stakeholders and businesses in the state of California.

The Tire Industry Association (TIA), with a 102-year history representing all segments of the national and international tire industry, is the leading advocate as well as instructor in technical training of tire service technicians.

We appreciate the opportunity to comment.

Sincerely,

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