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TIA Comments on Replacement Tire Efficiency Program Rulemaking

Additional submitted attachment is included below.

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California Energy Commission

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715 P Street

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TIA Comments on Replacement Tire Efficiency Program Rulemaking

Docket No. 26-TIRE-01

Dear Commissioners and staff,

On behalf of the Tire Industry Association (TIA), we appreciate the opportunity to submit comments on the California Energy Commission's updated proposed Replacement Tire Efficiency Program regulations. TIA also appreciates the Commission's continued engagement with industry stakeholders and its willingness to respond to concerns raised during this rulemaking process.

The Tire Industry Association (TIA), established in 1921, 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. TIA is the leading advocate as well as instructor in technical training of tire service technicians. 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 200,000 people since 1997.

TIA recognizes that the updated proposal includes several meaningful improvements that address concerns previously raised by the Association and industry stakeholders. TIA appreciates the Commission's efforts to provide more time for implementation, broaden the recognition of specialty tire categories, and clarify the scope of the program.

Among the changes TIA appreciates are the revised implementation schedule; the recognition of C-type tires and other specialty tire categories; an exemption for competition tires; the exclusion of tires with a speed rating of Q or lower and tires with an overall diameter of 34.5 inches or greater; provisions that better accommodate all-season winter performance tires; and additional administrative clarifications.

These changes are constructive steps toward a more workable regulation. At the same time, TIA continues to have significant concerns regarding the potential impact of the proposal on consumer prices and the increased use of older or used tires. While the revised proposal addresses several issues, TIA believes these economic and safety concerns remain important and should be considered before the regulations are finalized.

CEC staff previously estimated that the proposed low rolling resistance (LRR) tire requirements would increase the average cost of a passenger replacement tire by approximately $6.50. TIA continues to

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question whether that estimate reflects actual market conditions, particularly given product availability and the limited number of tires demonstrated through testing to meet the proposed requirements.

TIA's review of a common California passenger vehicle and replacement tire size— a 2017 Honda Civic using 215/55R16 tires—found substantially different real-world pricing. Using publicly available prices from major California tire retailers and comparing those products with the rolling resistance testing information referenced by the Commission, TIA found an average price of $117.36 for Phase 1-compliant CEC-tested tires, compared with $157.37 for tires marketed as LRR or fuel efficient and $81.30 for entry-level all-season tires that were not marketed as LRR.

The difference is significant. In some cases, consumers could face an increase of more than $300 for a complete set of four tires if affordable entry-level replacement options are displaced by more expensive compliant products. These costs would fall particularly heavily on lower-income and cost-sensitive consumers who depend on affordable replacement tires.

TIA is also concerned that higher replacement costs or reduced product availability could lead some consumers to delay replacing worn tires or purchase used tires instead. Consumers may continue operating tires beyond their recommended tread life to avoid the cost of replacement. Both outcomes can create safety concerns. A regulation intended to improve environmental performance should not unintentionally encourage consumers to postpone necessary tire replacement or rely more heavily on used tires.

TIA continues to have some general concerns regarding product availability, consumer choice, competition tire dealers face with bordering states, and potential pricing impacts as the program moves toward implementation. While the updated proposal contains important improvements, we encourage the Commission to continue considering these practical market impacts to help ensure that consumers and tire dealers have access to a broad range of replacement tire options.

TIA respectfully encourages the CEC to continue evaluating the economic and safety consequences of the proposal and to ensure that the final program preserves reasonable consumer choice and access to affordable replacement tires. The goal should be a program that advances efficiency without creating unintended barriers for consumers, independent tire dealers, or other businesses that serve the California market.

Finally, TIA continues to believe that consumer education and proper tire maintenance offer an important opportunity to improve fuel economy and reduce emissions without restricting consumer choice. Proper tire inflation can have an immediate and meaningful effect on fuel economy while also extending tread life, improving tire performance, and reducing costs for consumers. Encouraging drivers to maintain proper inflation across the vehicle fleet can therefore advance efficiency and environmental goals while also supporting roadway safety and tire longevity.

TIA appreciates the Commission's consideration of these comments and the meaningful changes reflected in the updated proposal. We look forward to continuing to work constructively with the CEC as the rulemaking moves forward.

Sincerely,

Roy Littlefield

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TIA TIRE INDUSTRY ASSOCIATION