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Subject: Docket 07-FET-1 Fuel Efficient Tire Proceeding

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Docket 07-FET-1 Fuel Efficient Tire Proceeding

CA Fuel Efficient tire requirements should focus in on an upgrade of inflation pressure retention characteristics of tires. It is recommended that an initial CA ruling could include certification by all manufacturers that tires meet the same inflation retention requirement that General Motors places on their original equipment suppliers. The technology is in place and available to all with no product risk. It can be readily implemented with manufacturing and cost adjustments.

The GM standard should be reviewed and it should be determined if it is rigorous enough to push inflation retention technology into the future. The standard should have an upgrade target after 3 years so as to give manufacturers and others the opportunity to develop additional technologies to address the "tire of the future" which will probably be smaller (faster inflation pressure loss) and operate at higher pressures (faster inflation pressure loss).

The Commission should include in it's tire inflation maintenance objectives, opportunities that exist at the dealer after market level that can further reduce the endemic of under inflated tires. TPMS systems, as they are now mandated, will exacerbate the under inflation/rolling resistance problem. Motorists will feel that no inflation maintenance is necessary until the system triggers (at the tire damaging 20% to 25% under inflation). High purity dry nitrogen inflation (>95%) offers technically proven opportunities. The commission can develop economic mechanisms to accelerate this developing tire service infrastructure. (Google "Herzlich Nitrogen" for more information)

The Commission should be very careful not to intrude on many aspects of tire materials, design and manufacture that can influence tire reliability and safety. The tread compound, which is a major contributor to the tires rolling resistance characteristics, requires major product development effort and impacts many competing tire performance safety issues. Tire manufacture is a complex mix of art and science and does not lend itself to "Invention by edict".

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