NATURAL RESOURCES DEFENSE COUNCIL

December 21, 2007

James Boyd, Vice Chair; Presiding Member, Transportation Committee
Jeffrey Byron, Commissioner; Associate Member, Transportation Committee
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 07-FET-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 07-FET-1 Fuel Efficient Tire Proceeding: Comments on Staff Presentation at the December 7, 2007 Committee Workshop

Dear Commissioners Boyd and Byron:

On behalf of the Natural Resources Defense Council (NRDC), I am pleased to provide comments addressing some of the questions raised during the California Energy Commission (CEC) staff presentation by Ray Tuvell at the Committee Workshop on the Fuel Efficient Tire Program on December 7, 2007. My comments are consistent with my presentation at the workshop but provide amplifying or additional information.

Fuel Efficient Tire Program Implementation Phases and Timelines

CEC staff has suggested that there are multiple phases to the implementation of the Fuel Efficient Tire Program. The implementation of each phase should be done in a way that easily facilitates the implementation of future phases. For example, the rating system developed as part of Phase I should be set up to provide a basis for the determination and setting of a minimum efficiency standard in Phase II. The rating system design requirements include a future efficiency standard, so CEC can quickly proceed to the implementation of Phase II after Phase I and complete the requirements specified by AB 844.

An overall timeline for AB 844 implementation should be specified as soon as possible by CEC staff that includes specific actions, due dates, responsible parties and required resources. NRDC recommends the schedule in Table 1 for program implementation. Table 1 is not intended to be a complete plan, as requested from staff, but only a list of significant milestones and approximate completion dates. Also, the listed milestones are not expected to be strictly serial in their attention; in many cases, progress on multiple activities can be achieved simultaneously.

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Table 1: Proposed Schedule for Program Implementation

Milestones	Completion Date
Finalize and publish test protocol for tire rolling resistance, including expected test facilities and validation that results are comparable across facilities.	March 2008
Establish replacement tire database, initially populated with representative data.	May 2008
Establish reporting requirements.	June 2008
Establish verification and compliance system for random testing and manufacturer challenges.	June 2008
Develop rating system.	September 2008
Establish label requirements.	November 2008
Determine minimum efficiency standard.	December 2008
Adopt and promulgate verification and compliance system (able to immediately start processing manufacturing reporting).	December 2008
Adopt and promulgate reporting requirements for manufacturers.	January 2009
Adopt and promulgate label requirements for manufacturers and dealers.	January 2009
Adopt and promulgate minimum efficiency standard.	September 2009
Establish procedure for program review and update.	September 2009

Vital Components of an Effective Rating Program Design

Data accuracy underpins the effectiveness of the tire efficiency program. An effective rating system will encourage consumers to choose more efficient tire models, which also meet a consumer's other purchase criteria, and result in fuel savings and reduction in global warming pollution. Data accuracy also protects those manufacturers that invest in the production of more efficient tire models. When all manufacturers are required to comply with the same level of tire efficiency data reporting and scrutiny, the rating system will truly represent the range of efficiency across competing products. The following criteria for handling tire efficiency data are vital components of an effective rating system design:

- Tire efficiency test results must be repeatable and be reported within a specified level of precision that clearly allows tire performance differentiation.
- Independent, third-party test facilities shall verify test results. All test facilities that meet minimum criteria for testing repeatability, accuracy and precision should be certified as test facilities for the sake of providing tire efficiency data for use in the state tire efficiency program.
- The rating system must be based on a common baseline so that tires from different product lines can be compared against one another in terms of efficiency.
- Random testing of tires for sale shall be conducted to ensure that their efficiency performance under the standardized test protocol is consistent with their assigned efficiency data and rating.
- A manufacturer and dealer challenge process must allow tire manufacturers and dealers to question and resolve the accuracy of the efficiency data and rating assigned to a tire.
- Consumer information programs to explain the efficiency data and rating system must be understandable to the broad public. Experts in efficiency labeling and

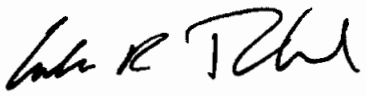
environmental standards along with manufacturers and tire retailers should be consulted to develop an effective label.

Administration of Tire Efficiency Program

On-going maintenance of a master tire efficiency database, rating system, test facility certification, data challenge process and labeling system is a significant undertaking that is required long after the initial tire efficiency program is adopted. Financial resources for on-going maintenance of the program need to be guaranteed so that consumers and manufacturers are ensured that the program will continue to provide accurate and verifiable information. CEC should leverage existing models of efficiency system management; the Cool Roofs Rating Council (www.coolroofs.org), relied upon by the roofing products industry is one example of an existing model.

I appreciate your consideration of these comments.

Sincerely,



Luke Tonachel
Vehicles Analyst, NRDC

Cc: Ray Tuvell, Manager, CEC Fuel Efficient Tire Program