



RUBBER
manufacturers
association

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December 11, 2013

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Proposed Greenhouse Gas (GHG) Regulations for Medium- and Heavy-Duty Engines and Vehicles and Amendments to the Tractor-Trailer GHG Regulation

On behalf of the member companies of the Rubber Manufacturers Association ("RMA"),¹ I am pleased to submit comments in response to the above-referenced proposed regulations. RMA member companies supply new and retread tires, both as original equipment and in the replacement market, for vehicles subject to these regulations. As such, RMA member companies will be affected by these regulations.

In general, RMA supports the amended and new proposed amendments. RMA appreciates that the California Air Resources Board (ARB) is adopting regulations consistent with the 2011 regulations promulgated by the U.S. Environmental Protection Agency (U.S. EPA) and the U.S. Department of Transportation National Highway Traffic Safety Administration (NHTSA) that setting greenhouse gas (GHG) emission standards and fuel economy standards for medium- and heavy-duty engines and vehicles ("Phase 1" regulations). RMA believes that streamlining regulatory requirements benefits regulated entities, the economy and the environment.

RMA is interested in how ARB plans to enforce the Phase 1 requirements for Model Years (MY) 2014 and beyond. It is unclear to RMA how new and retread tires will be evaluated during an in-use compliance audit. For the vehicles covered by the regulations, low rolling resistance tires are one technology that will be used by original equipment truck manufacturers to comply with the standards. The regulations do not set specific tire rolling resistance requirements, however. Instead, the rules offer vehicle manufacturers the flexibility to install components, including tires, that meet the whole-vehicle requirements.

In the preamble of the Phase 1 final rule, NHTSA and EPA note that "While the agencies encourage the exclusive use of LRR tires throughout the life of heavy-duty vehicles, we recognize that it is inappropriate at this time to hold vehicle manufacturers responsible for ensuring that this occurs." 76 Fed.Reg. 57278 (September 15, 2011). Instead, OE manufacturers are required to provide truck purchasers with information about tire replacements that will enable the owner to replace tires so that the vehicle conforms to the original certified vehicle configuration. 40 CFR 1037.125(i). Below are some examples of language that appears in operator's manuals to meet this requirement:

¹ RMA represents the tire companies manufacturing tires in the United States. RMA's membership includes: Bridgestone Americas; Continental Tire The Americas, LLC; Cooper Tire & Rubber Company; Michelin North America, Inc.; Pirelli Tire North America, Inc.; The Goodyear Tire & Rubber Company; Toyo Tire Holdings of Americas Inc. and Yokohama Tire Corporation.

- “Replacing a tire that is greenhouse gas certified”
 - o “...Replacement tires must be of equal or lower rolling resistance level (TRRL or Crr). Consult with your tire supplier(s) for appropriate replacement tires....”
- “Supplemental Federal Emission Control System Maintenance, Repair, And Replacement”
 - o “...Tire replacement should be to tires with GHG emission performance as good, or better, than tires originally equipped on the vehicle. Consult with the tire manufacturer for tire specifications.”
- “Replacement of tires that are GHG certified”
 - o “...Replacement of these tires should be with a tire of equal or lower rolling resistance levels (TRRL or Crr). Please consult your tire supplier(s) for appropriate replacement tires.”
 - o “... These may include, but are not limited to, low rolling resistance tires, aerodynamic devices such as hood, side fairings, and fuel tank fairings, vehicle speed limiters, and idle shutdown timers. If replacement of any drag-reducing component is required, the replacement component must meet or exceed the drag reduction performance of the originally installed component in order to maintain compliance with GHG14 requirements....”

In addition, the Phase 1 rules also require that components for which vehicle certification is dependent upon be identified on a label to help verify the presence of a component. Such labels can include tire designations of “LRRS”, “LRRD”, or “LRRR”. While this information is helpful to vehicle owners, it may prove difficult to use as a basis for replacing OE tires. Currently, this type of information does not exist that is available to consumers that would enable them to compare the rolling resistance (a measure of a tire’s energy efficiency) of different tire models that would allow the vehicle owner to replace the worn tire with a new tire or retread that meets the descriptions above.

SmartWay, a voluntary EPA Program that identifies best-in-class tires that meet thresholds for rolling resistance, provides some information to tire purchasers. However, SmartWay verified tires are not required OE equipment for compliance with the Phase 1 rules. Of note, the SmartWay program is limited to tires for long haul Class 8 tractors and trailers. This type of information is not available for tires for other classes of vehicles affected by the Phase 1 rules. As well, SmartWay targets are more stringent (lower RRC) than the criteria for designating a tire LRR under the Phase 1 rule.

Additionally, retreaded tires account for about 50 percent of the tires in service on heavy trucks. In 2012, EPA added a retread component to the SmartWay program. It is important to recognize the role retreads play in the overall truck tire market as an environmentally friendly technology that conserves natural resources and reduces the generation of waste. It is unclear how retreaded tires would be addressed during an in-use compliance audit.

It is unclear how ARB would use this information to conduct compliance audits in the field. It would be helpful for ARB to provide additional information about this topic. RMA advocates that ARB adopt the same approach as is outlined in the preamble to the federal Phase 1 final rule: the rule requires truck manufacturers to identify the OE tire as LRR if it is in fact LRR and provide information to truck owner operators such as is shared above about how to maintain the performance of the OE components but not require owners and operators to maintain the vehicle using specific tires, recognizing that “owner/

December 11, 2013

Page 3

operators may not have a sound knowledge of which replacement tires to purchase to retain the as-certified fuel efficiency of their vehicle.” 76 Fed.Reg. at 57278. RMA is willing to dialogue with ARB on this topic.

Thank you for the opportunity to submit the attached comments. If questions should arise, I can be contacted at (202) 682-4839 or tnorberg@rma.org.

Sincerely,

A handwritten signature in blue ink, reading "Tracy Norberg". The signature is fluid and cursive, with the first name "Tracy" and last name "Norberg" clearly distinguishable.

Senior Vice President & General Counsel