



July 6, 2010

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Proposed Regulation for Vehicles Operating with Under Inflated Tires

To Whom It May Concern:

Prior to stating our comments on the proposed legislation I must provide some background information on our company. Oil Changer, Inc. operates 34 fluid maintenance facilities throughout the state of California. We have provided quick oil changes to the motoring public since 1986. Our full service oil change has always included checking our customers' tire pressures and setting them to the correct PSI documented in their vehicle owner's manual. Properly inflated tires have safety and economic benefits besides those that benefit the environment. This has been a 'value-added' service we have been happy to offer for the past 24 years and we will continue to offer it in the future.

There are several issues Oil Changer has with the proposed rule change. First and foremost, we are concerned with being regulated by a new entity. Our company does not do repairs, therefore, is not regulated by the Bureau of Automotive Repairs ("BAR"). The BAR is the most logical regulatory agency to inspect service centers for compliance with this rule change. It is our belief that the BAR would like to expand its operating scope to include facilities like ours that they do not currently capture. Passage of such a regulation would be an

excellent foothold for the BAR to begin oversight of service centers that do not repair vehicles.

Oil Changer suggests the following changes to the proposed rule:

- ❖ This legislation should be limited to automotive service providers currently regulated by the BAR. As previously mentioned, an entity has not been designated to regulate this program as the Air Resources Board is not configured to inspect the type of locations.
- ❖ There is no guidance regarding tire check temperature. This can vary greatly based on many variables. Guidelines for this procedure need to be developed. There are many professional stakeholders that can provide their expertise in this matter.
- ❖ Our experience has found that customers occasionally do not want their tires checked. They many have come directly from having tires rotated and balanced or another tire-specific service where the pressure was set by another service provider. The rule should keep such instances in mind.
- ❖ Lastly, there is no reference guide to provide the correct tire pressure for every permutation of tire, wheel and vehicle on the road today. Custom applications are constantly being developed with guidance manuals lagging behind. A mechanism to deal with such tires must be developed.

And finally, the Board should be aware that other state entities continue to push for longer service intervals on motor vehicles. In the past, Oil Changer would see customers every 3,000 miles where their car's tires would be set at the correct air pressure, fluids would be topped off and trained technicians would provide general safety inspections. In 2010, we are contending with studies such as *The 3,000 Mile Myth* and public awareness advertising campaigns to lengthen oil change intervals. We ask that this be taken into consideration as the Board is going to great lengths to ensure the motoring public has the most efficient tire pressure which will decrease harmful air pollutants.

Thank you for this opportunity to provide comment on this proposed rule change.

Sincerely,

A handwritten signature in black ink, appearing to read "John Denholm". The signature is fluid and cursive, with a long horizontal stroke at the end.

John Denholm
Compliance Officer
Oil Changer, Inc.