



**RUBBER**  
manufacturers  
association

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Submitted Electronically: <http://www.arb.ca.gov/lispub/comm/bclist.php>

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

**RE: PROPOSED REGULATION TO REDUCE GREENHOUSE GAS  
EMISSIONS FROM VEHICLES OPERATING WITH UNDER INFLATED  
TIRES**

On behalf of the tire manufacturer member companies of the Rubber Manufacturers Association (RMA),<sup>1</sup> I appreciate the opportunity to submit comments on the Proposed Regulation to Reduce Greenhouse Gas Emissions from Vehicles Operating with Under Inflated Tires (“Check and Inflate Program”).

The Check and Inflate Program would require Automotive Service Providers (“ASP”) to check vehicle tire inflation pressure when a vehicle comes in for service and properly inflate the tire if it is found to be underinflated. RMA supports the overall policy goals of the proposed Check and Inflate Program. Increasing the incidence of proper tire inflation on consumer vehicles in the state of California would allow Californians to improve vehicle fuel economy, save money on gasoline needs and reduce greenhouse gas emissions. Equally important, improving tire inflation pressure would also improve tire and vehicle safety and save lives.

RMA member companies are committed to educating consumers about proper tire inflation. Since 2001, RMA has sponsored Be Tire Smart, Play Your P.A.R.T. (**P**ressure, **A**lignment, **R**otation and **T**read), a national consumer education and awareness campaign about proper tire maintenance. As part of this program, RMA sponsors National Tire Safety Week, held annually to highlight proper tire maintenance, including proper tire inflation pressure. This year’s Tire Safety Week is planned for June 7 – 13, 2009.

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<sup>1</sup> RMA is the national trade association representing more than 100 companies that manufacture various rubber products. These member companies include every major domestic tire manufacturer including: Bridgestone Americas Holding, Inc., Continental Tire N.A.; Cooper Tire & Rubber Company; The Goodyear Tire and Rubber Company; Michelin North America, Inc.; Pirelli North America; Toyo Tire (U.S.A.) Corporation and Yokohama Tire Corporation.

RMA encourages the California Air Resources Board (“ARB”) to join with RMA to educate consumers about the importance of proper tire inflation pressure. The proposed regulatory program to require vehicle service providers to perform inflation pressure maintenance when vehicles are being serviced establishes an important tire maintenance framework, tire inflation pressure should be checked and adjusted at least every month and before any long trip.

For most vehicles, the Check and Inflate Program will provide quarterly tire inflation pressure maintenance. Consumers need to be educated that they need to play a vital role by checking and properly inflating their tires in the intervening months. RMA recommends that in addition to the regulatory Check and Inflate Program, ARB embark on a public education and outreach campaign for monthly pressure checks.

RMA is pleased to provide specific comments below on various elements of the Proposal as outlined in the California Air Resources Board Staff Report: Initial Statement of Reasons for Proposed Rulemaking – Proposed Regulation of Under Inflated Vehicle Tires (February 2009) (“ISOR”).

#### **A. Tire Pressure Gauges**

RMA agrees that accurate tire pressure gauges are essential to properly inflating tires. The ISOR requires that ASPs use “dial-type tire pressure gauges that meet ANSI B401.1 Grade B specifications.” (ISOR at 6-7). The referenced ANSI specifications provide accuracy requirements for the tire gauge measurements.

While RMA supports the accuracy ranges provided, RMA recommends that ARB allow ASPs to use tire gauges with equivalent accuracy instead of requiring ANSI B40.1 Grade B tire gauges. ASPs should have the flexibility to use comparable tire gauges, whether dial-type or digital, to measure tire air pressure for purposes of this regulation.

#### **B. Tire Inflation Reference Manuals**

ARB correctly has identified that it is important for ASPs to have access to information that would help to determine proper tire information for tires installed on specific vehicles. However, RMA recommends revisions to the requirements ARB has set out to obtain that information.

The ISOR requires ASPs to obtain a “Tire Inflation Reference Manual, if they do not already have one available.” RMA recommends that ASPs not be required to obtain such manuals. Instead, ARB should provide information about where to obtain recommended inflation pressures for specific vehicles, including a reference to the Tire Guide. ARB should allow require that the ASP have current tire inflation pressure information available on site but allow flexibility as to the manner the information is available (Tire Guide, computer terminal, etc.).

The ISOR also provides that an ASP would be required to “maintain, on the premises, a tire inflation guidebook or yearbook that is current within *three years*” (emphasis added). Since vehicles change from model year to model year, it is important that ASPs have current information on tire inflation recommendations. Even in the same vehicle model, tire sizes and inflation pressure recommendations can change between model years. Therefore, an ASP must have tire pressure recommendation information including the current vehicle model year.

Regarding the Tire Guide, ARB has inaccurately identified the source of the 2008 Tire Guide. This publication is produced and distributed by Tires Guides, Inc. and is available for purchase on its website at <http://www.tireguides.com>. The ISOR identifies that this document is distributed by Goodyear. This is inaccurate – while individual tire manufacturers, dealers and distributors may provide information to retail locations at their discretion as part of a sales relationship, Goodyear and other tire manufacturers do not distribute Tire Guides publications to the public. Tire manufacturer product catalogues provide only the maximum inflation pressure for tires, not *recommended* inflation pressures for tires installed on specific vehicles. RMA requests that the reference in the ISOR that “manuals are available through most tire manufacturers” be removed from the document.

Additionally, the ISOR provides the 2008 Year Book, published by the Tire and Rim Association, Inc. as another example of a tire inflation reference manual. While it is true that this publication includes tire load and inflation tables, it does not provide information specific to individual vehicle applications of tires. This publication would not provide the information necessary for an ASP to properly inflate vehicle tires. RMA recommends that ARB remove any reference to the Tire and Rim Association, Inc. Year Book for purposes for providing proper tire inflation pressures for specific vehicles.

The vehicle manufacturer provides the recommended inflation pressure for tires installed on specific vehicles. The recommended inflation pressure, commonly referred to as “placard pressure,” can be found in the vehicle owner’s manual and in one of several places on the vehicle, including the driver’s side B-pillar, the forward edge of the rear side door (when the sides doors open toward each other) or the rear edge of the driver’s side door. All permissible locations on the vehicle for the tire placard are specified at 49 CFR 571.110 S4.3. This recommended tire pressure should be followed for all tires installed on a vehicle that are the same tire size, load index and speed rating as specified by the vehicle manufacturer.

Most larger tire dealers have included the recommended inflation pressures for tires installed on specific vehicles in their computer systems utilized in tire retail stores. In these types of computer systems, the tire retail sales person or technician simply enters the vehicle make and model into the computer. The computer then provides information on the tire size, load index and speed rating specified by the vehicle manufacturer and the vehicle manufacturer-recommended tire inflation pressure for that tire. ASPs with this

type of computer system in use at retail locations should not be required to purchase and utilize tire reference manuals in addition to using this type of computer system.

## **B. Non-OEM Tires and Wheels**

In the case of a vehicle with tires installed that are not the original equipment size and load index, proper tire inflation pressure guidance is important. Due to the differences in tire size and load index that can occur when a replacement tire is installed that is not the OEM size, inflation pressure recommendations are often different between the OEM – sized tire and the non-OEM sized replacement tire. RMA believes that additional consideration of what requirements should be included in this regulation with regard to non-OEM sized tires and rims is warranted. Tire and vehicle safety, environmental benefit and ASP capabilities must all be considered when creating guidance on this complex topic. Specific recommendations to ASPs on the issue of proper inflation of non-OEM tire and rim assemblies should be developed to ensure proper tire inflation at the ASP. RMA recommends that this topic be addressed as part of the development of the “tire inflation guideline” contemplated in the ISOR (ISOR at 53).

## **C. Exemptions**

### **1. Unsafe Tires**

The ISOR provides an exemption to the check and inflate requirement for tires deemed by the ASP to be unsafe. RMA disagrees with exempting such tires from the check and inflate program. Of course, tires that have visible damage should be replaced, but if the consumer elects not to replace at the ASP, the tire has a greater chance of continuing to perform properly and at its optimum fuel efficiency until it is replaced if it is properly inflated. RMA recommends that if the ASP deems the tire to be “unsafe,” that the ASP advise the consumer of the tire’s condition and recommend replacement. If the consumer refuses replacement at the servicing ASP (or if the ASP does not offer that service), the ASP should inflate the tire to the recommended placard pressure and recommend the tire be replaced as soon as possible. This recommendation would promote tire safety, which is a stated benefit of this regulation (see ISOR at ES4).

### **2. Tires Inflated with Nitrogen**

The regulation would allow consumers with tires inflated with pure nitrogen to refuse the “inflate” portion of the check and inflate service. RMA opposes this exemption. If a tire inflated with nitrogen is underinflated, it should be properly inflated as part of the check and inflate service. An underinflated tire inflated with nitrogen is not operating optimally, either from a safety or fuel economy perspective. Underinflated tires with nitrogen are still underinflated tires and should be properly inflated for optimum vehicle fuel efficiency. Nitrogen provides no benefit in need of preserving in an underinflated tire.

### 3. Spare Tires

The ISOR is silent on the issue of spare tires. In the case where a consumer's vehicle has a temporary spare tire installed on the vehicle, that temporary tire should be not exempted from check and inflate requirements. The recommended tire pressure of a temporary spare tire will likely differ from the recommended pressure for the permanent tire, so the ASP should be instructed to check the vehicle placard to obtain the recommended inflation pressure for the installed spare tire. If the spare tire is not installed on the vehicle but instead stowed on the vehicle, the ASP should be exempted from checking and inflating the spare tire.

#### D. Pressure Checks on Tires that are "Hot"

The ISOR addresses the issue of conducting pressure checks on tires that are "hot." See ISOR at 53. The ISOR defines a "cold" tire as one that has not been driven on for at least three hours. RMA agrees with this definition. The ISOR then proposes that "all tires be filled to the manufacturer's recommended pressure." First, this should specify that the tire be inflated to the *vehicle manufacturer's* recommended pressure, but only the tire's pressure was below the recommended pressure when checked. If the tire measured above the recommended pressure when measured hot, the tire should NOT be deflated to the recommended pressure.

#### E. Other Considerations

As a general rule, tires should never be deflated as part of the check and inflate program. Instead, if a tire's pressure is measured higher than the recommended vehicle placard inflation pressure, the ASP should be directed make a note of it on the invoice but not adjust the inflation pressure. This would be consistent with the RMA Tire Care and Safety Guide, published by RMA.

As a caveat, a tire's pressure should never exceed the maximum inflation pressure as marked on the sidewall of the tire, regardless of the inflation pressure as stated on the vehicle placard. This precaution is important because in some situations, a consumer could have installed a replacement tire that is the same size as the original equipment tire but a different load range, which may not be immediately noticeable by the ASP. This would address the case where someone has a 1/2 or 3/4 ton pick-up or van that originally had load range E OE tires with a placard pressure of 80 psi, but replaced them with a P-metric (35 psi max) or load range C (50 psi max) version of the tire size. If the ASP were to instead inflate the tire to the vehicle's placard pressure in this scenario, it would create an unsafe condition because the inflation pressure would exceed the maximum allowable inflation pressure for the tire.

## **F. Documentation and Recordkeeping Requirements**

### **1. Service Estimates**

RMA notes that the cost analysis in the ISOR states that the staff “expects ASPs to recover their costs by passing on their costs to their customers (individual) either by increasing their labor service rates or by imposing an environmental fee on the invoice.” (ISOR at 40). This assumption implies that an ASP would be allowed under this regulation to charge the consumer for this service as a separate line-item on the invoice.

The Proposed Regulation Order (“Order”) requires the ASP to indicate on the invoice that the check and inflation service was completed and note the tire pressures after the service was performed. The Order further requires that the ASP “keep the vehicle service invoice onsite in accordance with the Business and Professions Code Section 9884.11 of the California Code of Regulations section 3356.

It is unclear whether, based on the apparent ability for an ASP to charge for the service as a separate line-item on the invoice and the invoice requirements whether the ASP would also be required to include the check and inflate service on an estimate provided pursuant to the Business and Professions Code Section 9884.11 fo the California Code of Regulations section 3353. That section provides that “no work for compensation shall be commenced and no charges shall accrue without specific authorization from the customer” according to the requirements set forth in the regulation, which includes estimates for parts and labor.

RMA asks that ARB clarify whether or not charges associated with the check and inflate service are subject to the estimate requirements in Business and Professions Code Section 9884.11 of the California Code of Regulations section 3353.

### **2. Requirement to Include Tire Pressure Information on Invoice**

As discussed above, the Order requires ASPs to document that the check and inflate service was completed and the adjusted tire inflation pressures on the invoice. Some tire retailers provide the consumer with a separate vehicle service checklist as a part of the vehicle service that notes the fluid levels checked, tire pressures, etc. This checklist is stapled to the customer’s invoice. Records of this checklist are kept along with the invoices generated during a service visit. RMA recommends that the requirement that the check and inflation information be recorded on the invoice be amended to allow the flexibility for an ASP to provide this information in a checklist format accompanying the invoice if that procedure is more consistent with the customer service approach at a particular retailer, as long as the records of the checklist are kept along with the service invoice for the requisite period (three years).

**G. Technical Correction**

RMA has noted an instance in the ISOR where the Rubber Manufacturers Association is incorrectly referred to as the “Rubber Manufacturing Association.” *See* ISOR at 3, Table III-2. RMA requests that the reference be corrected.

**H. Opportunities for Financial Assistance for Compliance with this Program**

Currently, consumers are assessed a \$1.75 fee per new tire at point of sale. Sellers of new tires collect fee from their customers for each new tire they sell. The retailer pays the fee to the BOE, who deposits \$1.00 of the fee in California Tire Recycling Management Fund (administered by the Integrated Waste Management Board (IWMB)) and \$0.75 of the fee in Air Pollution Control Fund. IWMB distributes funds for activities related to scrap tire enforcement, remediation, research, market development, and a hauler manifest system. The IWMB also uses a portion of the fund to promote proper tire maintenance in order to promote longer tread life of tires, which enables tires to last longer and generate fewer scrap tires. The Air Resource Board uses its portion of the fee to fund the Carl Moyer Program. RMA recommends that ARB consider potential grant or other financial assistance programs for ASPs to purchase capital equipment to be funded by the tire fee.

**I. Conclusion**

Once again, RMA appreciates ARB’s efforts to achieve proper tire inflation on vehicles in California and supports this regulation, with the changes and additional consumer information programs discussed above. RMA looks forward to continuing to work with ARB staff on this important regulation. RMA notes with interest that ARB staff intends to develop a tire inflation guideline as part of this regulation (ISOR at 53). RMA would be happy to facilitate participation in the development of that guidance by tire industry experts. RMA and its members recognize the vital role proper tire inflation plays in achieving optimal safety and environmental performance of their products. Please contact me at (202) 682-4839 or [tnorberg@rma.org](mailto:tnorberg@rma.org) should you have any questions about the information provided in these comments.

Sincerely,



Tracey J. Norberg  
Senior Vice President and  
Corporate Counsel