



RUBBER
manufacturers
association

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January 29, 2010

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

RE: Proposed Modified Regulatory Language for 15-day Comment Period, Regulation to Reduce Greenhouse Gas Emission from Vehicles Operating with Under Inflated Tires

I am pleased to submit this supplemental comment letter on behalf of the Rubber Manufacturers Association (RMA)¹ on the above-mentioned notice and request for comment.

RMA and its members appreciate and support the efforts of the California Air Resources Board (ARB) to reduce greenhouse gas emissions by requiring that automotive service providers check tire inflation pressure and inflate underinflated tires to the recommended air pressure. In addition to the greenhouse gas reduction benefits this regulation will achieve, properly inflated tires will help to increase tire safety and save lives on the road.

RMA is committed to promoting proper tire care and maintenance. RMA manages a public education campaign to promote these important tire safety messages called “Be Tire Smart: Play your PART,” where “PART” stands for Pressure, Alignment, Rotation and Tread. Through its annual National Tire Safety Week, RMA works with over 20,000 tire retail partners across the country to check tires for proper inflation pressure, remaining tread depth and vehicle alignment. RMA works to get the message out to the public with media interviews, events and public service announcements. RMA welcomes

¹ The Rubber Manufacturers Association (RMA) is the national trade association for the rubber products industry. Its members include more than 60 companies that manufacture various rubber products, including tires, hoses, belts, seals, molded goods, and other finished rubber products. RMA’s eight tire manufacturer member companies operate 30 manufacturing plants, employ thousands of Americans and ship over 90 percent of the original equipment (OE) tires and 80 percent of the replacement tires sold in the United States. RMA’s tire manufacturer member companies include Bridgestone Americas Inc., Continental Tire North America, Inc., Cooper Tire & Rubber Company, The Goodyear Tire & Rubber Company, Michelin North America, Pirelli Tire North America, Toyo Tire North America, Inc. and Yokohama Tire Corporation.

ARB as an ally in this important effort to protect the environment by contributing to reducing greenhouse gas emissions, decreasing scrap tire generation and saving lives.

Concerns with Modified Regulation Order

RMA appreciates and supports many of the modifications that have been made in the Modified Regulation Order. However, RMA is concerned about the definition of “unsafe tires” on page 3 of the text. (Section 95550 (c)(14)).

First, RMA does not support the concept that an automotive service provider should be able to decline properly inflating a tire because that provider deems a tire “unsafe.” We understand that automotive service providers are concerned about potential allegations of liability should a tire with other problems be inflated as part of this program. We recommend that ARB address this issue by limiting liability of the automotive service provider should the check and inflate service be performed but allow the automotive service provider to disclose concerns about the condition of the tire and recommend that the tire be removed from service and replaced.

Second, if ARB nevertheless decides to include a definition of “unsafe tires” in this regulation and allow an automotive service provider not to inflate a tire on that basis, RMA requests that ARB revise the definition of “unsafe tire.” RMA requests that ARB remove the reference to “age” in this definition. The age of a tire does not determine its fitness on the road. Instead, its condition, its remaining tread depth and how it has been used determine whether it is safe for continued use. Further, there is no “standard industry practice” regarding tire age. Some tire and automobile manufacturers have set recommended removal dates, but these dates are not standard industry practices and are not based on tire performance data.

RMA has developed guidance on tire service life that describes the factors that affect the service life of a tire. This statement is provided as an attachment to these comments.

We appreciate the opportunity to provide these comments on the Proposed Modified Regulatory Language. Please contact me should any questions or need for clarification arise. I can be reached at (202) 682-4839 or tnorberg@rma.org.

Sincerely,



Tracey J. Norberg
Senior Vice President

STATEMENT OF RUBBER MANUFACTURERS ASSOCIATION

Tire Service Life for Passenger Car and Light Truck Tires

Tires are designed and built to provide many thousands of miles of excellent service but must be maintained properly. As explained below, the service life of a tire is affected by many factors that are independent of the chronological age of the tire.

Service Life is Not Determined by Chronological Age

Tires are composed of various materials, including rubber, having performance properties essential to the proper functioning of the tire. These component properties evolve over a combination of time, service and storage conditions. For each individual tire, this change is affected by many elements such as temperature, storage conditions, and conditions of use (e.g., load, speed, inflation pressure, impacts and road hazard injury) to which a tire is subjected throughout its life. Since service and storage conditions vary widely, accurately predicting the serviceable life of any specific tire based on simple calendar age is not possible. RMA is not aware of scientific or technical data that establishes or identifies a specific minimum or maximum service life for passenger and light truck tires. However, in some cases a tire or vehicle manufacturer may make a specific tire replacement recommendation regarding its products. If so, the consumer should consult the manufacturer with any questions with regard to following the recommendation. Further, any such recommendation should not be considered a **minimum** serviceable life for the tire.

The Consumer Plays A Primary Role in Tire Maintenance

The tire industry has long emphasized the consumers' role in the regular care and maintenance of their tires. (Tire care and service manuals are available from RMA on its website, www.rma.org.) Tires should be removed from service for several reasons, including tread worn down to minimum depth, signs of damage (cuts, cracks, bulges, vibration, etc.) or signs of abuse (underinflation, overloading, etc). That is why it is recommended to have tires, including spares, inspected regularly. A monthly maintenance inspection, for which the consumer must be primarily responsible, should focus on proper inflation pressure, tread wear and tire damage. This monthly inspection should be supplemented by recurring rotation, balancing and alignment services. This inspection should occur whether or not the vehicle is equipped with a tire pressure monitoring system. Additionally, the condition of a tire should be assessed regularly to determine if there are any tactile or visual signs of damage that make replacement necessary.

Storage, Rotation, and Other Conditions That May Affect Tire Service Life

Tires should always be stored in a dry, cool, well-ventilated place. Avoid storing tires in areas that are exposed to wetness, petroleum or petroleum-based products, extreme temperatures, direct sunlight, and/or other sources of ozone, such as electric motors. Storage areas should also be clean and free of grease, gasoline or any corrosive chemicals which can deteriorate the rubber.

If a vehicle is fitted with a matching full-size spare tire (same size and type as other in-service tires) the consumer should follow the vehicle manufacturer's recommendation for rotating the spare tire. When any spare tire is placed into service, its inflation pressure must be checked immediately.

Consumers are strongly encouraged to be aware not only of their tires' visual condition but also of any change in dynamic performance such as increased air loss, noise or vibration. Such a change in performance could be an indication of an internal condition that might dictate removing the tires from service immediately to prevent a tire failure. In these cases, RMA recommends that consumers consult a tire service professional.

Adopted March 2006