Automotive Service Councils of California
Professionals in Automotive Service - Since 1940

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Automotive Service Councils Of California

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March 20, 2009

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

RE: Proposed Regulation for Under Inflated Vehicle Tires

Dear Clerk:

On behalf of the Automotive Service Councils of California (ASCCA), we are writing to provide comments to the proposed regulation for Under Inflated Vehicle Tires. The ASCCA is a statewide organization that represents nearly 1,500 automotive repair facilities including smog shops.

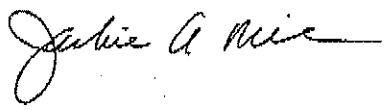
The ASCCA has the following comments and suggestions:

1) The proposed regulations should apply to all automotive service providers registered with the Bureau of Automotive Repair (BAR) and that perform automotive repair services.
2) Any tire pressure gauge that meets a national standard for accuracy should be acceptable under the proposed regulations.
3) The tire reference references and guides will need to be traceable and should be reflected as such.
4) The proposed regulations are not clear as to whether the service provider must check inflation of vehicle tires while the tire is "hot" or wait for a period of time and check when the tire is "cold". This concern was raised at the Air Resources Board workshops and has not been adequately addressed in the proposed regulations.
5) As you are well aware, the BAR has regulatory oversight of the automotive repair dealers in the state. BAR has the expertise and personnel to properly oversee the enforcement of this proposed regulation rather than the Air Resources Board. As such, we hereby respectfully request that the BAR act as the authorized representative to enforce this regulation.
6) We are concerned that the regulation does not address the issue of oversized tires as well as the modification of a vehicle to accommodate such. We respectfully request that this matter be addressed in the regulation.

7) Finally, the regulations do not address the situation whereby a consumer refuses to have a tire check performed by the automotive repair dealer. We respectfully request that the regulation be amended to address this issue, as well.

Thank you for your consideration. Please feel free to contact us if you have any questions.

Sincerely,



Jackie A. Miller
Executive Director for
Larry Nobriga, Chair, Government Affairs Committee

CC: Members, ASCCA Government Affairs Committee
Jack Molodanof, ASCCA legislative advocate