



June 5, 2002

National Highway Traffic Safety Administration
Docket Management
Room PL-401
400 7th Street, SW
Washington, DC 20590

RE: Docket Number NHTSA-00-8011
Federal Motor Vehicle Safety Standards; Tires

To Whom It May Concern:

On March 5, 2002, the National Highway Traffic Safety Administration (NHTSA) published a Notice of Proposed Rulemaking (NPRM) on Federal Motor Vehicle Safety Standards for tires as a result of the Transportation Recall Enhancement Accountability and Documentation (TREAD) Act, (P.L. 106-414). The International Tire & Rubber Association (ITRA) and the Tire Association of North America (TANA) are submitting comments regarding the NPRM on behalf of our members.

ITRA and TANA are two trade associations representing over 4,000 businesses and have members in all sectors of the tire industry. Our membership is comprised of tire dealers, wholesalers and distributors, manufacturers and retreaders, businesses that sell, service and recycle tire and rubber products, as well as companies that provide equipment and services for the tire industry. The two associations are scheduled to merge into a single

association on July 1, 2002, and we are submitting comments jointly so that NHTSA may hear ITRA and TANA's unified voice.

Since the tire safety standards have not been upgraded since 1967, ITRA and TANA appreciate the opportunity to participate in the process with NHTSA on the proposed regulation. Today's vehicle owners drive faster and farther than thirty years ago, thanks in part to the advancing technology of the tire industry. NHTSA reports that consumers drive 10.25 trillion tire miles each year. "Tire failure related accidents," which are defined by the National Automotive Sampling System – Crashworthiness Data System (NASS-CDS) as "tow-away crashes caused by blowouts or flat tires," today number 23,464 annually.

ITRA and TANA note that of the NASS-CDS tire-related, tow away crashes there is no way to determine if a tire caused an accident due to consumer misuse, design flaws, or road hazards. In order to better direct future efforts to improve public safety, the government needs to keep more detailed records of "tire failure related" accidents.

The tire industry is delivering almost 437 million tire miles of safe driving between tire related tow-aways or crashes reported. And statistics indicate that consumers are largely responsible for these tire related crashes or tow aways. NHTSA's surveys read that approximately 36 percent of passenger cars and approximately 40 percent of light trucks had at least one tire that was at least 20 percent below the recommended cold inflation pressure. Approximately 26 percent of passenger cars and 29 percent of light trucks had at least one tire that was at least 25 percent below the recommended cold inflation pressure.

Tire professionals in business today – the people who actually sell and service tires in the United States, and are represented by ITRA and TANA –

believe that most tire-related accidents are caused by under-inflation, road hazards, improper tread depth and other user-related factors. Given that NHTSA's surveys and an overwhelming number of tire industry professionals point to consumer negligence playing a role in alleged "tire failures", ITRA and TANA question the completeness of the NASS-CDS data. It is most important that while NHTSA considers tire testing standards for the tire industry, the agency understand that the tire industry delivers hundreds of millions of safe driving miles between tire related accidents, and many of the remaining alleged "failures" are related to user error, not tire construction. ITRA and TANA maintain that the focus of the industry's and the government's efforts should be on affecting proper tire usage and maintenance by all vehicle operators.

NHTSA's own estimates say that over 30 percent of all tires on the road today would fail this new proposal. With the safety record that we have cited, ITRA and TANA question regulating the tire industry with such stringent, expensive standards that do not correlate with real world experiences.

ITRA and TANA maintain that consumer actions play the most important role in tire safety. Information must reach the public. In this effort, ITRA and TANA are committed to educating the public through our 4,000-plus members at the point-of-sale to consumers. Both organizations continue to work closely with NHTSA in the "Tire Safety, Everything Rides On It" campaign. The response of our members for safety campaign materials was overwhelming, with calls and e-mails flooding into NHTSA requesting copies of the brochures and checklists.

ITRA and TANA also participated with the Rubber Manufacturers Association (RMA) in "National Tire Safety Week" (April 28 – May 3, 2002). Our members disseminated over 120,000 pieces of RMA's informational

materials across the country and provided free tire safety checks for consumers all week long.

It should be carefully noted that when faced with this issue, other countries have acted to regulate the consumer, not the tire industry. Today Great Britain enforces random tire checks, with violators facing penalties. ITRA and TANA believe that it is the consumer's responsibility to use and maintain their tires properly, and while NHTSA's proposed changes to tire testing are a preventative step towards safer tires, it is the resolution of consumer error, not revised tire construction, that will make the greatest impact on U.S. roads and highways.

ITRA and TANA would like to offer the following comments on the tire testing standards proposal on behalf of our 4,000 members:

HIGH SPEED TESTS

In comments to NHTSA, RMA " proposes a high speed test that produces running temperatures 21% higher than the current FMVSS 109 test for passenger tires and is a new requirement for light truck tires. The temperatures generated by this test are 20% higher than the temperatures generated at the same conditions on a flat surface for both passenger and light truck tires. We feel this is a significant increase in severity and meets the intent of the TREAD Act."

On behalf of the over-4,000 members of ITRA and TANA, we support the proposal made by the RMA.

The tire manufacturers' concerns about testing tires above 100% load and over the speed rating of the tire are shared by ITRA and TANA. NHTSA's proposed High Speed Tests are in three tiers: the first sequence the tire is run

at 87 mph, the second is 93 mph and the last sequence the tire is run at 97 mph. Any present-day tire with a Q rating is not designed to pass this last test. Test results will generally show heat precipitated tread chunking as opposed to tread separation, but that will still fall under the definition of a tire "failure" according to FMVSS 109. These test results likely would not reflect real world experiences.

ITRA and TANA commend NHTSA for reducing the load in the parameters of the High Speed Test from 88% to 85%. The reduction in load during the High Speed Test is a step in the right direction, but not enough to offset the TPMS final rule. Manufacturers will be expected to automatically design reserve pressure in a tire to comply with the TPMS rule, which will be 30 percent below recommended pressure or 20 psi (whichever is greater).

ENDURANCE TEST

Light truck (LT) rated tires are designed to carry heavy loads and to withstand the abuse of both on- and off-the-road operations on heavy-duty vehicles. Because of the abuse these vehicles receive, they must have heavier treads and sidewalls and in many cases will have deep heavy lug tread designs. While testing load range E tires at 75 mph might be acceptable, to test them for 10 hours at 100 percent load and 22 hours at 110 percent load on a test wheel at 56 psi is not realistic when the tire is designed to run at 80 psi. These are not real world conditions as the tire will flex more and generate much more heat due to its heavy construction. Air pressure and load limit tests are much more severe when conducted on a curved test wheel in a lab instead of a flat road surface representing the real world. LT rated tires with heavier casing construction should be tested at pressures not less than 80 percent of their maximum inflation pressure.

RMA's comments proposed an alternative endurance test.

"RMA proposes the following alternative test protocol that:

- _ Reduces load from 110 to 100%;
- _ Reduces duration from 40 to 34 hours in 4 / 6 /24-hour steps;
- _ Adjusts light truck tire inflation pressure from 75% of maximum to 81.8% of maximum to reflect a proportional load capacity as shown in the TRA light truck load tables;
- _ Adjusts light truck tire speed from 120 km/h to 110 km/h to maintain comparable severity from flat to roadwheel similar to passenger tires; and
- _ Reduce ambient temperature from 40°C to 38°C.

We believe this change reflects a reasonable "raising of the bar", resulting in an increased severity of >20% compared to FMVSS 109/119."

ITRA and TANA support the alternative endurance test proposed by RMA.

LOW INFLATION PRESSURE TESTS

Responding to NHTSA's request for comments on its low inflation pressure tests, ITRA and TANA emphasize that a tire by the very nature of its use should not be run under-inflated, just as most cars today should not be run at maximum speed. The effect of both can be disastrous. The main difference is that the government asks motorists to slow down, while – in the tire industry's case – it appears that the tire industry is being asked to do the opposite: conform to negligent consumer habits. ITRA and TANA maintain that while consumers should obey the speed limit, they should also be responsible for the safe maintenance of their vehicles, especially

their tires – the only equipment on a car that comes between the vehicle and the road.

Under-inflation in a tire can cause many problems including:

- Heat build-up (when the tire is unable to reach its “equilibrium” of internal heat build-up and external dissipation)
- Sidewall damage
- Loss of maneuverability of the vehicle
- In rare cases, unseating of the bead
- Reduced gas mileage and waste of natural resources due to increased rolling resistance
- Preventing reuse of a tire casing through retreading, and increasing scrap tire/solid waste problems

An improperly inflated tire (either over- or under-inflated) is also more likely to suffer damage as a result of road hazards/impacts and is more susceptible to premature and/or uneven wear.

These issues are why tire standard setting bodies such as the Tire & Rim Association recommend a minimum psi per tire per vehicle. ITRA and TANA continue to support an individualized approach to establishing a minimum psi for vehicles, and we recommend against an “across the board” approach.” In the Tire Pressure Monitoring System (TPMS) comments (Docket No. NHTSA-2000-8572) TANA wrote, “TANA recommends changing from an ‘across-the-board’ approach to tire pressure levels to an individual study of each vehicle’s proper tire inflation levels. Tire manufacturers know their products and how to utilize them for optimum, safe performance.”

In the TPMS NPRM, NHTSA’s proposal read:

Section C - Definition of "Significantly Under-Inflated." In general, the tire manufacturers believe that "significantly under-inflated" should be defined as any pressure below the minimum pressure specified by the tire industry's standard-setting bodies for a vehicle's gross vehicle weight rating (GVWR) or gross axle weight rating (GAWR). They argue that any tire with an inflation pressure below the pressure specified by those bodies as necessary to carry the vehicle's GVWR or GAWR creates a potential safety problem. They are concerned that tires with a pressure even 1 PSI below this level will experience increased temperatures and be more likely to fail.

The vehicle manufacturers would like the agency to leave the definition of "significant under-inflation" to them. They argue that there are too many vehicle-tire-load combinations for the agency to set one standard, and that the vehicle manufacturers can best determine at what inflation pressure a particular tire on a particular vehicle is significantly under-inflated. They suggest that the agency give them the flexibility to determine the level of significant under-inflation for the tires on each vehicle.

NHTSA believes that the tire manufacturers' definition is overly strict.

ITRA and TANA strongly disagree with NHTSA's comments and support the tire manufacturers' definition of significant under-inflation. These recommendations by the tire manufacturers were made to safeguard consumers.

ITRA and TANA maintain the strong belief that tires should not be run under-inflated. For this reason we oppose both of NHTSA's proposed Low Inflation Pressure Tests. In both tests, the proposed "Low Pressure – TPMS Test" and the "Low Pressure – High Speed Test," NHTSA intends to test all tires at 30 percent below placard or 20 psi, whichever is greater. This inflation level

is far off the recommended minimum psi of almost any passenger or light truck tire.

ITRA and TANA cannot emphasize strongly enough that tires must be run at specific recommended pressure to perform safely.

If NHTSA moves forward with low inflation pressure tests, we strongly recommend against testing all tires at 30 percent below recommended pressure or 20 psi (whichever is greater). ITRA and TANA recommend testing to a percentage below the recommended minimum operating pressure at a given load as specified by the tire manufacturers, and or, as specified by the Tire & Rim Association. If, in fact, the purpose of this rulemaking is to address tires used on vehicles with a gross vehicle weight of under 10,000 pounds, this would include many vehicles that use tires that require an inflation pressure of up to 80 psi.

For example, tire size LT235/85R16 load range E, requires 80 psi to carry a load of 3,042 pounds. Although the carrying capacity of this particular tire goes beyond the 10,000 lb. range, ($4 \times 3,042 = 12,168$ pounds) this tire has been the most popular LT tire for many years, used on three-quarter ton Ford pick-ups. As late as 2001, the LT235/85R16 and other popular sizes for three-quarter ton trucks like the LT245/75R16 and the LT265/75R16 accounted for over 40% of LT tire shipments in the United States. It is unreasonable to expect these tires, or others like them, to function perfectly at 20 psi. There are a multitude of different sizes, speed ratings, and load ranges compiling fitment for vehicles with a gross weight of less than 10,000 pounds. To expect each tire in NHTSA's 10,000-pound category to pass a 20-psi durability test with perfect scores is not reasonable.

In comments to NHTSA regarding Low Inflation Pressure Tests, RMA proposes a modified Option 1 test:

- Adjusts light truck tire speed from 120 to 110 km/h to maintain consistency with the RMA proposed endurance test conditions;
- Reduces the test load from 100 to 90% of the tire's maximum load capacity to reasonably simulate the effect of a 30% decrease in inflation pressure when the test pressure is specified at the minimum pressure listed in the NPRM at paragraph S6.4.1.1.1; and,
- Extends the time from 15 minutes to one hour for post-test measurement of inflation pressure.

ITRA and TANA support the RMA's proposed alternative to NHTSA's Option 1.

ROAD HAZARD IMPACT TEST

ITRA and TANA do not think that NHTSA has properly defined the problem for which they are now proposing a test. It is impossible to design a tire that can withstand all road hazards.

ITRA and TANA support RMA's proposal to study the methodology of road hazard impact tests and to let NHTSA and ASTM work together to come up with a proposal that will affect the safety of the motoring public.

If a road hazard impact test is promulgated, ITRA and TANA believe that retreaders should be exempt from the test. The retread process does not affect the structure of an original casing, as the process only replaces the tread, therefore retreaded tires should be exempt from the road hazard tests.

BEAD UNSEATING TESTS

ITRA and TANA support the current bead unseating tests, and the most important fact to note is that tires will remain seated at the bead if they are

properly inflated. Upgrading the bead-unseating test, while a worthy idea, will not necessarily result in safer tires for several reasons. First and foremost, tires come unseated from the bead due to under-inflation more than any other reason. In the case of bead seating, the focus of safety comes back to proper tire inflation.

With NHTSA's proposal for newer, more stringent bead unseating tests, it would be reasonable to anticipate that tire manufacturers to comply with the new standard will design stiffer sidewalls, lower beads and possibly even reconfigured rims. On behalf of the members of ITRA and TANA, we would like to point out that this could have unintended consequences on many small tire businesses. If it becomes more difficult to unseat a tire from the bead, it will become more difficult to mount or demount a tire. This development may leave tire technicians more prone to damaging the beads during installation or removal from a vehicle. Also, the tire technician will need higher pressure to seat the bead when mounting a tire, placing tire technicians in a potentially harmful position. As a result of this test the tire industry may see more damaged beads and wheels, and the impact will be felt by those family-owned tire and automotive service dealerships that mount and demount the tires. This effort may attempt to solve one hazard (tires becoming unseated from the bead) but create several more for the tire service industry. ITRA and TANA emphasize that these revised test specifications for bead unseating may have an unintended negative impact on the businesses that sell and service tires.

RMA states in their comments to NHTSA:

"RMA continues to believe, with the global tire industry, that a bead-unseating test is not required for radial tires. The levels of force required to pass the current FMVSS-109 bead unseat test are sufficient. The fact that radial tires can pass the test more consistently than bias tires does not make the current test

insufficient. It simply means that the design of radial tires allows them to handle lateral forces much more efficiently than bias tires. Radial tires should not be penalized because of their efficiency.

If a bead unseat test must be maintained, RMA suggests that the current test be retained rather than adopting a completely new test. NHTSA testing shows that the current test gives essentially the same but more consistent results than the Toyota test as modified by NHTSA. Therefore, we see no advantage to the proposed test over the current test.

For the future, there is already an ASTM committee established to develop needed modifications to the current FMVSS-109 bead unseat test, as well as evaluating and developing the proposed wedge test into a usable regulatory test, if possible."

ITRA and TANA agree that a new bead unseating test is unnecessary. The current standard is sufficient.

ITRA and TANA would also ask that if NHTSA moves forward with bead unseating tests, that retread tires be exempt from the tests. The new air loss tests (for bead unseating) apply pressure to the tread to simulate real world conditions. The forces are designed to translate from the tread area through the sidewall to the bead. The bead of the tire is part of the original casing and is not altered in the retreading process, and, as such, the tests should not be applicable to retreading to avoid redundancy in testing the original casings.

AGING EFFECTS TESTS

NHTSA is seeking comments on the three alternatives for new Aging Effects Tests. The three options are an Adhesion (Peel) Test, Michelin's Long-term Durability Endurance Test and the Oven Aging Test.

ITRA and TANA support RMA's recommendation to not proceed with an aging test. The TREAD Act does not mandate an aging test. Therefore NHTSA should re-evaluate aging tests to find a proven method of testing a tire in a real

world situation. ITRA and TANA are convinced that an oven aging test does not accurately predict the correlation with real world experiences. An oven aging test is useful to test the breakdown of chemical adhesion properties, but the test is not fully applicable for testing the aging properties of a tire. If a tire is tested in an oven, the tire is not "exercised" as it is on a car.

If NHTSA moves forward with an aging test, of the three NHTSA proposals, the oven aging is still the least objectionable test. RMA suggested an alternative oven aging test that proposes two modifications:

- 1) Change the aging temperature from 75 to 70°C. 70°C is an industry standard for aging of rubber compounds and used by some companies for aging of tires prior to test.
- 2) Adopt the ambient temperature, inflation pressures, and speed from the RMA recommended endurance tests with steps of:
 - 4 hours at 85% load
 - 6 hours at 90% load
 - 14 hours at 100% load

ITRA and TANA would support this alternative and also firmly believe that retreads should be exempt from any such test.

RETREADING INDUSTRY

NHTSA's proposal for new bead unseating tests and the road hazard impact tests address retreaded passenger/light truck tires. If NHTSA moves forward with promulgating these two tests against the recommendations of ITRA, TANA and RMA, ITRA and TANA recommend that retreaded tires not be subjected to these tests. The retread process does not affect the structure of an original casing, as the process only replaces the tread, therefore retreaded tires should be exempt from the road hazard impact test and the air loss tests.

If retreaders are required to implement these two new tests there will be a significant economic impact on small retreading facilities. It is important to note that many of the business potentially affected by such a regulation are small, family-owned businesses. ITRA and TANA note that these tests, and the associated extra costs to retreading businesses are not necessary. It is redundant to test a casing twice.

SHEAROGRAPHY

ITRA and TANA members note that while shearography can be a useful tool, especially in assisting other types of tire evaluations (such as pressure testing, x-rays and ultra sound), the results of shearography are too subjective and open to many levels of interpretation. Shearography may work well on a new tire, but it is much less reliable on used tires, and defects that can be found through shearography can be found through other tire testing methods as well. The landscape of technology is also rapidly evolving and if NHTSA chooses to mandate shearography, it potentially will replace other processes that could further improve tire safety currently or down the road. While shearography might seem more practical because of advances in computer-based technology, in ITRA and TANA's opinion it is not necessary to mandate shearography into the tire testing process. It would hinder current technology and other promising advancements.

The retread industry would take a severe economic hit if it were required to use shearography equipment. Most retread facilities are small businesses that could not afford to buy a machine. A low-end machine would cost approximately \$135,000, plus labor and maintenance would cost a business an additional \$40-50,000 annually.

COST ESTIMATES

NHTSA writes:

“The Agency’s estimate of the price increase to improve tires up to the performance levels required in the High Speed and Endurance tests is \$3 per affected tire. Based on testing we estimate that about one-third (32.8 percent) of all tires would need improvements to pass those two tests. If the cost for these improved tires were spread across the entire new light vehicle fleet, the average new vehicle price increase would, we estimate, be \$4.09 per vehicle. The overall annual cost of these tests for new original equipment (64 million tires) and replacement tires (223 million tires) is estimated at \$282 million for a total of 287 million tires sold annually and the net costs per equivalent life saved would be about \$7.2 million.”

The RMA is estimating that the costs to manufacturers of compliance with this proposal are far beyond NHTSA’s estimate of \$3 per tire. RMA estimates over \$1.5 billion in the first year alone, and in excess of \$400 million every year afterwards to maintain these tests. These estimates also do not include any tire manufacturers that are not members of RMA, which includes many small manufacturers and foreign manufacturers that import tires to the U.S.

While our tire dealer members may have to absorb more costs and/or pass them down to consumers, our retread members are very concerned about this proposal. If retreaders are mandated to run the bead unseating and road hazard impact tests on casings that have already been tested, and invest in more labor, equipment and maintenance, the \$3 per tire estimate becomes far too low and will put many small retreaders out of business. If the costs of retreading go up due to compliance, many retreaded tires may come closer in price to new tires. Therefore this regulation could result in the downfall of the retread industry.

Every test must be based on sound science and have a proven track record for improving safety. The costs of this NHTSA proposal do not outweigh the speculative, unproven benefits.

SPECIALTY TIRES: SPECIALTY EQUIPMENT MARKET ASSOCIATION (SEMA)

ITRA and TANA fully support SEMA's comments and recommend that specialty radials and bias-ply tires remain subject to FMVSS 109 and 119. ITRA and TANA members would lose the ability to sell and service these antique or racing tires if they were made obsolete by the upgraded standard. The individuals who use these tires are part of an exceedingly narrow market of antique car or racing aficionados. These individuals would know how to properly use and maintain these tires so as not to raise the safety concerns that the TREAD Act is addressing.

SEMA has a number of concerns relative to subjecting limited production runs of specialty bias-ply or radial tires to the enhanced tire testing procedures NHTSA envisions as a part of a new FMVSS No. 139.

Quoting from SEMA's comments to NHTSA:

"The many different lines and sizes of specialty aftermarket bias-ply and radial tires produced by SEMA member companies like Denman, Hoosier Tire and Specialty Tires of America are intended for specialized use as replacement tires on passenger cars and light trucks. None of these manufacturers produce or market tires for the mass market. The market for these tires is unique. Sales are concentrated in the areas of collector and special interests cars and trucks ("custom" vehicles, hot rods, restored vehicles, etc.), all terrain or off-highway vehicles (OHV), and other mostly limited-use vehicles. Because these vehicles have on-highway uses, the tires used to outfit them require U.S. Department of Transportation designation. The result is that tires made for collector car

hobbyists as well as for recreational or “show” purposes will be required to pass NHTSA’s updated tire performance standard.

- NHTSA should make certain that any new tire standard is specifically related to the safety concerns and vehicles the TREAD Act aims to address. They should also consider vehicle design characteristics in creating any new tire regulation.
- Subjecting limited production bias-ply and radial specialty aftermarket tires to proposed FMVSS No. 139 is not based on specific or proven safety need.
- Limited production specialty bias-ply tires cannot meet the standard of proposed FMVSS No. 139 and will be unfairly outlawed. In addition, the testing and compliance costs associated with subjecting specialty radial tires to proposed FMVSS No. 139 will effectively eliminate them from the marketplace as well.
- There is sufficient justification for allowing specialty tires to remain under the testing regimen of FMVSS Nos. 109 and 119.
- NHTSA underestimates the effects of subjecting specialty bias ply and radial tires to proposed FMVSS NO. 139 on small specialty tire manufacturers, as well as small business specialty aftermarket wholesaler/distributors, retailers and consumers.
- NHTSA has not conducted a cost/benefit analysis with respect to aftermarket specialty tires or small business concerns.

“SEMA proposes that limited-production specialty radial and bias-ply tires remain subject to the current testing procedures of FMVSS Nos. 109 and 119 unless NHTSA can prove that these products constitute a safety hazard or that FMVSS Nos. 109 and 119 are substandard for the application. While SEMA does not propose a number to define “limited-production”, it does note that NHTSA currently provides an exemption from the Uniform Tire Quality Grading Standards to manufacturers of 15,000 tires or less of the same design and size (49 CFR 575.104). Additionally, NHTSA has issued a proposed rule to implement the TREAD Act’s early warning requirements which would also provide a reporting exemption to

manufacturers of 15,000 tires or less or the same design and size. Both actions would seem to acknowledge a cost/benefit rationale that (1) tires manufactured in limited production do not pose a general safety issue; and (2) the potential cost for small businesses to otherwise comply with these rules would not be justified. SEMA advocates the same approach for applying FMVSS No. 139."

ITRA and TANA fully support SEMA's comments.

SPECIALTY TIRES: RMA

RMA recommends, "that the proposed FMVSS 139 apply to new pneumatic radial tires on powered motor vehicles (other than motorcycles) than have a gross vehicle weight rating (GVWR) or 10,000 pounds or less and that were manufactured after 1975. Tires designed for severe snow conditions (designated with a mountain/snowflake symbol), speed restricted tires (designated with speed restrictions shown in FMVSS 119), various trailer tires for special use (for example, designated "ST", "FI", "MH"), temporary service spare tires (designated with "T" prefix in the size), and all bias tires should be excluded from FMVSS 139 and continue to be certified under existing FMVSS 109 and 119.

For purposes of this standard, a passenger tire should be defined as one intended for normal highway service and its size designation typically shown a "P" metric or "Hard" metric. A light truck tire should be defined as one intended for normal highway service and its size designation includes "LT" and is load range "C", "D", or "E".

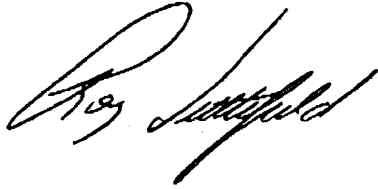
RMA also recommends that FMVSS 109 "should remain applicable for bias and bias-belted tires, temporary spare tires, and other specialty tires...The strength and bead unseating tests should continue, at least on an interim basis, until more suitable upgrades are developed."

ITRA and TANA support RMA's clarification of this NPRM for specialty tires.

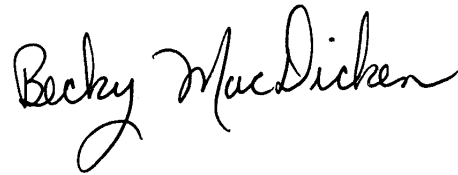
If you have any questions about our comments please call Roy Littlefield at 301/577-4956 x. 108 or Becky MacDicken at 703/736-8082. ITRA and

TANA look forward to continuing to work with NHTSA on these important issues.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Roy Littlefield". The signature is fluid and cursive, with a large initial "R".

Roy Littlefield
Director of Government Affairs
International Tire & Rubber Association
America

A handwritten signature in black ink, appearing to read "Becky MacDicken". The signature is cursive and elegant, with a large initial "B".

Becky MacDicken
Director of Government Affairs
Tire Association of North