



February 12, 2002

National Highway Traffic Safety Administration  
Docket Management  
Room PL-401  
400 Seventh Street, S.W.  
Washington, DC 20590

Re: Docket No. NHTSA-01-11157  
Tire Safety Information

To Whom It May Concern:

On December 19, 2001, NHTSA published a Notice of Proposed Rulemaking (NPRM) regarding tire safety information as a result of the Transportation Recall Enhancement Accountability and Documentation (TREAD) Act (Public Law 106-414). The International Tire & Rubber Association (ITRA) and the Tire Association of North America (TANA) are submitting comments on the NPRM on behalf of our members.

ITRA and TANA are the primary trade associations in the tire industry, representing over 5,000 businesses including every major manufacturer and all sectors of businesses that sell, service and recycle tire and rubber products, as well as companies that provide equipment and services for the tire industry. In short, with every segment of the industry represented and more members than any other group, ITRA and TANA speak for the tire industry. The two

associations are scheduled to merge into a single unified association on July 1, 2002, and we are submitting comments jointly in an effort to help NHTSA hear the tire industry's unified voice on its rulings.

To provide background on the two associations that will merge on July 1, ITRA is an international nonprofit trade association representing 1,800 companies worldwide that manufacture, sell, service and recycle tire and rubber products, as well as companies that provide equipment and services for the tire industry. ITRA members include companies of all sizes, from family owned retread, repair, recycling and commercial businesses to manufacturers such as Bridgestone/Firestone, Goodyear, Michelin, Cooper Tire & Rubber Company, Continental North America, Bandag and many others.

The other merging association, TANA, is the tire industry's largest association representing approximately 3,500 businesses in North America. The majority of TANA members are small to medium-sized independent and family-owned businesses (averaging \$3 million to \$5 million in annual sales) that sell, service and install new, used and retreaded tires on all vehicles, from passenger cars to heavy equipment and trucks. The majority of TANA members are independent tire dealers, and that group – independent tire dealers – sold 59.5% of the passenger tires in the United States last year. In short, TANA members represent the market that sells almost two-thirds of the replacement

passenger and light truck tires in the U.S. each year. Many of our members also perform automotive service and repair work. Every major manufacturer is also a member of TANA

Today ITRA and TANA are submitting joint comments.

The NPRM states, "Proposed Labeling Requirements: 1) Tire Markings - NHTSA proposes that all labeling information specified under S4.3 of FMVSS No. 109, including the TIN, be placed on both sides of light vehicle tires..."

The members of ITRA and TANA respectfully oppose mandating that the TIN be placed on both sides of a tire. The TREAD Act was designed to improve tire safety for the public but we do not see the safety-relatedness of placing the TIN on both sides of a tire justifying the costs to the manufacturers. While we agree that it would be more convenient for the public to locate the TIN if it is placed on both sides of a tire, a consumer can drive to their nearest tire dealer if they need assistance locating the TIN in the event of a recall.

The retreaders we represent say that the costs would quickly mount if every mold in the United States (and every mold for international companies wanting to export to the U.S.) were required to add more information to one side of the mold. The statement made by NHTSA that says, "NHTSA believes that this proposal would result in minimal costs for tire manufacturers," and puts an estimate at \$5.5 million for the industry is significantly below the industry's projections. ITRA and TANA retreaders report that the costs of

changing their molds would be excessive, and the Rubber Manufacturers Association, a third tire industry association representing the manufacturers, estimates that the costs to the manufacturers could exceed \$100 million annually. We believe the costs to ITRA and TANA retreaders and tire manufacturers are unnecessary. While aluminum molds might be slightly less costly to retool, it would be very expensive to add the TIN to the second side of a steel mold because it must be hand-grooved.

Placing the TIN on both sides of the tire is also dangerous for employees who have to get up inside the molds to change the date code section of the TIN weekly. With newer sectional molds being used more than clam-shells, changing the upper half of a mold would require the employee to risk serious burns and possible other injuries, or the manufacturers to allow the molds to cool off before replacing the TIN, losing valuable time in the manufacturing process. Most manufacturers aim to operate 24 hours a day, seven days a week. This loss of productivity would be very costly to the manufacturers without a true safety benefit other than convenience to the consumer. There is no safety benefit to the consumer by putting the TIN on both sides of a tire that justifies the costs to retreaders and manufacturers and the safety risks to their employees.

Ply, Cord, Tube and Tire Type- NHTSA proposes that all labeling information specified under S4.3 of FMVSS NO. 109 including the TIN be placed on both sides of light vehicle

tires except for that information cited in paragraphs (d), (e), (f) and (g) of S4.3. The required information in these paragraphs (generic name of cord material, actual number of plies, "tubeless" or "tube type" designation, and the word "radial" if applicable must be present on one of the sidewalls.

ITRA and TANA believe it is important to leave that information on both sidewalls of the tire for the retread, repair and recycling industries. When tires are processed for retreading or repairing, it is important for the retreader or repair technician to understand the make-up of the tires and the types of plies. This enables the retreader or repair technician to select the proper repair materials or procedures for retreading or repairing the tires. Recyclers who grind and process tires into other recycled products need to know the types of fabric, steel and other components in the tires as new technologies are developed.

Additionally, a steel cord radial tire can experience a circumferential or "zipper" rupture in the upper sidewall when it is operated in an underinflated or overloaded condition. If information regarding the number of plies and cord material is removed from the sidewall, technicians cannot determine if the tire has a steel cord sidewall. As a result, many light truck tires will be inflated outside a restraining device or safety cage where they represent a substantial threat to the technician. This information is critical when determining if the tire is a candidate for a zipper rupture and very important in normal handling.

We urge NHTSA to require that information be left on both sidewalls of a tire.

TIN – The Agency proposes two revisions to the TIN:  
(1) Require that the first six characters of the TIN to contain the following information: The first two characters would reflect the plant code, and the next four characters would reflect the date code, "...

ITRA and TANA strongly object to reordering the TIN numbers. This change to the TIN would do little to enhance consumer safety, but it would thoroughly confuse the tire industry. Our tire dealer members and consumers would have to deal with the old version of the TIN while those tires remain on the road and learn to understand the new version. The overlap could potentially last 10 or more years, depending on the life of current tires. During this period of time with two systems, if there were another recall, consumers would only be more confused than with the current TIN, trying to figure out the age of their tire and which TIN is on their tire. There is no need to reorder the TIN because even with the reordering, consumers will still have to be told what the numbers mean. Confusing the consumer is a safety issue, not only an issue of convenience to the public. However, these safety issues do not seem to justify the high costs of reordering stencils or regrooving molds to the manufacturers and retreaders.

Also, retreaders use a three-character plant code (instead of two characters for a new tire) in their TIN. This code will also cause a lot of confusion if the TIN is unnecessarily reordered.

(2) require 6 mm (1/4") as a uniform height font size  
– The Agency requests comments on the readability of a 6 mm font size for the TIN characters.

ITRA and TANA believe that 6 mm (1/4") is a suitable height for TIN characters. Our dealer members feel this is sufficient to allow the TIN to be easily read. However, ITRA and TANA urge NHTSA to allow companies to use fonts larger than 6 mm (1/4") as well. Many retreaders and manufacturers currently use font sizes larger than 6 mm (1/4") and would have to retool if these larger sizes were not allowed. A uniform size is not necessary as long as it can be read. We therefore strongly commend NHTSA for saying, "...there is no restriction that would prevent tire manufacturers from using larger font size for the TIN characters."

#### Vehicle Placard Content and Format

NHTSA has proposed four sets of revisions for the presentation of tire pressure and vehicle placard information. ITRA and TANA commend NHTSA for their proposal and have no significant recommendations to the first three revisions. We believe all of these changes will help the consumer better understand their tire pressure requirements and load limits.

In the fourth revision, “the agency proposes to replace the vehicle’s recommended tire size designation with the tire size designation for the tire installed as original equipment on the vehicle by the vehicle manufacturer. While in most instances these two numbers would be identical, this minor revision insures that the consumer is provided with the correct tire inflation pressure information for the tire size actually installed on his vehicle as original equipment by the vehicle manufacturer. The agency considered adding a requirement for the vehicle manufacturer to label all recommended optional tire size designations on the vehicle placard and/or tire inflation pressure label. While this consideration would provide recommended tire inflation pressure information for consumers who opt to replace factory installed tire sizes with optional tire sizes, we have tentatively concluded that this is not a feasible requirement...”

ITRA and TANA can understand the rationale NHTSA has used in “tentatively” concluding that it is not feasible to require different (optional) tire sizes to be listed on the proposed placard. However, we would urge NHTSA to include the manufacturer’s Original Equipment (OE) options to be noted on the placard and in the owner’s manual. In order to avoid confusion, anything listed on the placard should be contained in the owner’s manual.

Figure 5 – Locating and Understanding Load Limit Information

ITRA and TANA believe the proposal for the “Steps for Determining Correct Load Limit” is very user-friendly and will make it much easier for consumers to understand load limits.

Other Issues – Maximum Permissible Inflation Pressure –  
The Agency is not proposing to remove or to revise

the requirement for the maximum permissible inflation pressure marking on the tire...”

ITRA and TANA commend NHTSA for this decision. We strongly believe that the maximum pressure is critical information for any tire technician or consumer servicing a tire. The maximum inflation pressure in psi helps to avoid unintentional over-inflation of tires and needs to be readily accessible to those working on tires or a consumer filling his/her tires at the local air pump.

Point-of-Sale Information – The agency, as a part of this rulemaking, does not propose to require dealers to provide point-of-sale tire information. The agency does not possess evidence that point-of-sale information would prove more successful than consumer information campaigns at educating the consumer concerning tire safety.

ITRA and TANA are dedicated to assisting NHTSA in their tire safety campaign, “Tire Safety: Everything Rides On It.” We have already sent out information to our memberships about this safety campaign. It is also our intent to have a “Tire Safety Week” later this spring. We continue to work closely with our memberships to help them educate the public. At this time there is no need for further government action.

Request for Comments on Particular Issues – Should NHTSA define or specify what a “reasonable amount of luggage” is for a vehicle with an occupant in every designated seating position?

ITRA and TANA believe the more specific the directions can be, the better the consumers will understand. Using specific weight amounts will be very helpful to the consumer and give them a better idea of the load limit for their vehicle. We might suggest using the word load instead of luggage if the Agency wants to be more specific about how much weight a vehicle can carry.

Should the Agency consider prohibiting some or all non-required information from being labeled on the tire sidewalls?

Absolutely not. ITRA and TANA would strongly oppose a prohibition on non-required information. Foreign manufacturers would be unable to label tires for their own countries and still conform with U.S. regulations in the event they export to us.

#### Costs

ITRA and TANA believe NHTSA to have substantially underestimated the costs to the tire industry. The costs of retooling molds in manufacturing plants and retread facilities would be much larger than NHTSA states. Most retreaders are small businesses (which NHTSA notes in the Regulatory Flexibility Act section of this proposal). A typical retread facility would have between 10 and several hundred molds, and to change each mold would cost an estimated minimum of \$250.

The costs of complying with this proposed regulation to the large manufacturers would be significant but it could be financially detrimental to

retreaders. ITRA and TANA believe that the economic impact of this proposal could deal a crushing blow to the retread industry, leaving only the largest retread facilities in operation.

Lead Time – The Agency proposes to phase-in compliance for tires according to the following schedule: All P-metric tires manufactured on or after September 1, 2003, and all LT tires manufactured on or after September 1, 2004. Additionally, all light vehicles manufactured on or after September 1, 2003, would have to comply with the final rule.

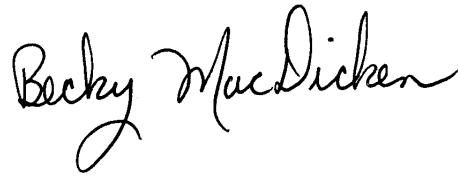
ITRA and TANA would ask that if this proposed regulation were implemented, that more lead-time be given to the manufacturers and retreaders. The life expectancy of a tire mold is several years and the initial cost is thousands of dollars. We recommend that NHTSA say any new molds purchased as of the effective date must comply with the regulation, but allow a phase-in period of at least five years for older molds, in effect grandfathering those that still have life in them but would not conform with the regulation as it currently stands.

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 the first name being the most prominent.

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 the last name being the most prominent.

Becky MacDicken  
Director of Government Affairs  
Tire Association of North