

April 23, 2004

Ezana Wondimneh
National Highway Traffic Safety Administration
U.S Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Wondimneh:

On behalf of the 5,000-plus members of the Tire Industry Association (TIA), I am submitting comments regarding NHTSA's Phase II of Performance Testing of Medium and Heavy Truck Tires.

TIA is an international association representing all segments of the tire industry, including those that manufacture, repair, recycle, sell, service or use new or retreaded tires, and also those suppliers or individuals who furnish equipment, material or services to the industry. TIA was formed by the July 2002 merger of the International Tire & Rubber Association (ITRA) – formerly the American Retreaders Association (ARA) – and the Tire Association of North America (TANA) – formerly the National Tire Dealer and Retreaders Association (NTDRA).

On April 9, 2004, NHTSA asked TIA for input regarding Phase II of truck tire testing that is to be performed in support of potential rulemakings to upgrade FMVSS 119 and 120. TIA will be responding on behalf of our retread members. We believe the Rubber Manufacturers Association (RMA) will provide you with the new tire data.

With regard to questions 1-4, the retread industry does not keep the data NHTSA is requesting. TIA would be happy to provide NHTSA with an estimate at a later date, if it is deemed truly necessary, although it will take time to pull together an accurate estimate.

Having said that, TIA believes that the tire size and load ranges for retread tires will be very similar to the new tire manufacturer numbers.

TIA also believes that NHTSA will find that the load range N tires are not applicable to this testing. These tires are typically not found on over-the-road vehicles. J & L load ranges, while found occasionally on garbage or dump trucks, are also not used frequently in over-the-road applications.



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Therefore, for Phase II of the testing, TIA recommends NHTSA focus on Load Range G & H, with the appropriate tire sizes.

NHTSA's Question 5 is, "What non-dynamic tests can be used to qualify retread tires (Example: Pull testing)?"

TIA recommends the adhesion pull tests, burst strength tests and plunger tests for retread tires. These tests are common in the retread industry. However, this is only for your testing phase. TIA does not recommend mandatory use of these tests in the industry in the future.

TIA would encourage NHTSA to keep an open mind about the use of technology available in the industry for inspecting the casings during testing. Although shearography is an excellent tool for inspecting finished retreads and new tires, other technologies can assist with inspecting casings for integrity as well. Ultrasound has been used very successfully in the industry for several years, along with shearography and holography. However, none of these systems can detect a nail hole in a casing. There are systems available, such as the Hawkinson NDT and Micro Tester units, which detect penetrations through the inner liner and nail holes through casings. New technology is almost always in development for inspecting casings, and TIA would ask for NHTSA's assurance that *any specified testing procedures* will be flexible and allow for the use of new technologies as they are developed. TIA will not support a mandate on the retread industry with regard to specifying a particular method of non-destructive casing examination.

Question 6 is, "What, if any inspection, labeling or other requirements would benefit the retread industry?"

TIA recommends that NHTSA implement a requirement that the DOT code of a retread tire be placed within 6" of the original new-tire DOT code. This will make it easier within the industry to keep a "history" of each tire casing as it comes back to retread plants and know how many times a casing has been retreaded. This gives an inspection technician additional information about the tire and is helpful in predicting the appropriate level of service for a given retread.

Beyond that, TIA strongly believes that the retread industry does not need to be regulated. The retread industry has an excellent safety record. Retread tires have never been the subject of a recall.

Other points or comments:

1) TIA would strongly recommend that NHTSA examine all tires before and after Phase II tests to get an accurate read on each tire and the results of the test. Representatives of TIA would appreciate the opportunity to examine tires before and after Phase II tests to help develop information that could respond to any deficiencies that may be recognized.

2) Phase I of the truck tire testing is complete and TIA would like to examine the data NHTSA compiled from this testing as soon as possible. TIA also requests the opportunity to examine tires from Phase I of the truck tire testing. If tires failed in Phase I, TIA representatives would like to examine those tires to determine the causes.

3) TIA would like to extend an invitation to NHTSA to have an honorary seat on TIA's Training Committee. We believe a NHTSA representative could offer a lot to our Committee as it moves forward developing training programs for the entire tire industry. Please strongly consider working with us for the benefit of the industry.

As you know, the retread industry is also a major player when it comes to recycling. About 15 million tires are retreaded a year saving the trucking industry \$3.8 billion annually, according to the Technology & Maintenance Council (TMC) of the American Trucking Association. When manufacturing a new tire, 22 gallons of oil are processed into each tire. Since 15 gallons of that oil goes into the casing, every retreaded truck tire saves 15 gallons of oil. Multiply that by the number of retreads to see that retreaded truck tires save the environment 225 million gallons of oil. With oil prices escalating, more companies and agencies should consider retreading options.

Just recently, the United States Postal Service awarded a national retreading contract to help save costs for their fleets by retreading instead of buying new tires and scraping perfectly good tires. Retreads are a good economic and environmental choice for truck tires. TIA will work to insure that the industry can maintain these benefits for our nation.

The rubber found on the side of US roads is often blamed by the uneducated to be "those darn retreads." TIA knows this to be inaccurate. Rubber on the road is caused by underinflation and overloading of all tires, not the retread process. According to the TMC, about 88% of roadside debris is caused by underinflation/overloading of tires. TIA encourages NHTSA to keep this in mind while moving forward both on these truck tire tests and a potential Tire Pressure Monitoring System regulation for truck tires.

Thank you for your attention to our comments. If we can be of any further assistance, please call Becky MacDicken at 703-642-3162 or Marvin Bozarth at 502-742-4696. We look forward to working with you on this important project.

Sincerely,



Becky MacDicken
Director of Government Affairs
Tire Industry Association



Marvin Bozarth
Senior Technical Consultant
Tire Industry Association