



August 1, 2024

Roy Littlefield IV  
Vice President of Government Affairs  
Tire Industry Association  
1532 Pointer Ridge Place  
Suite G  
Bowie, Maryland 20716-1883

Dear Mr. Littlefield:

Thank you for your question to the Occupational Safety and Health Administration (OSHA) regarding European Commercial Metric (C-type) tires for commercial cargo vans. We would also like to thank you for bringing the LT and C-type tires and meeting with us and demonstrating the similarities between those tires. This letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any questions not delineated within your original letter. Your paraphrased question and OSHA's response are below:

**Background:** The scope of 29 CFR 1910.177 applies to the servicing of multi-piece and single piece rim wheels used on large vehicles such as trucks, tractors, trailers, buses, and off-road machines. It does not apply to the servicing of rim wheels utilizing automobile tires or truck tires designated "LT". See 29 CFR 1910.177(a)(1).

There is a new category of light truck (LT) tires designated as "C" for European Commercial Metric (C-Type), which is also recognized as a light truck tire by the US Tire Manufacturers Association. These C-Type light truck tires share similar characteristics with traditional light truck tires designated as "LT," such as sizing, load capacities, and inflation pressures, but notably lack the "LT" designation.

**Question:** Do the European Commercial Metric Light truck tires designated as "C" without the "LT" designation fall under the coverage of 29 C.F.R. § 1910.177?

**Response:** Yes. While C-type tires have similarities to "LT" tires, they are not identical nor universally interchangeable. However, failure to comply with any portion of 29 C.F.R. § 1910.177 related to servicing of pickup trucks and vans using C-type tires may be considered as a *de minimis* condition. *De minimis* conditions are those where an employer has implemented a measure different from one specified in a standard, that has no direct or immediate relationship to safety or health. The conclusion that a *de minimis* condition exists is fact specific and will depend on whether the installation, use, methods of servicing, and the necessary equipment required to service the tires are substantially similar to "LT" tires.

Our understanding is that your question relates to federal OSHA requirements. However, because you are an industry association that might have members in different States, you should be aware that there are States that administer their own [OSHA-approved State plan](#). Such States are required by law to have a program of standards and enforcement that is at least as effective as the Federal OSHA requirements. However, those States may enact more stringent requirements. An employer in such a State is required to follow the State's more stringent requirements. If you are interested in information on this issue as it pertains to a State that administers its own OSHA-approved State plan, please contact that State for specific information on its interpretation and enforcement policy with regard to this issue.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. OSHA requirements are set by statute, standards, and regulations. Our interpretation letters explain these requirements and how they apply to circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult [OSHA's website](#). If you have any further questions, please feel free to contact the Office of General Industry and Agricultural Enforcement at (202) 693-1850.

Sincerely,



Scott C. Ketcham, Director  
Directorate of Enforcement Programs