



October 28, 2019

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David Jasinski
Office of the Chief Counsel
National Highway Traffic Safety Administration (NHTSA)
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Notice of Proposed Rulemaking: Technical Corrections and Clarifications Related to Tires and Rims, 84 FR 43563, RIN 2127-AL87 (August 21, 2019).

Dear David:

On behalf of the U.S. Tire Manufacturers Association (USTMA), I am pleased to submit this letter with an additional short comment on the above-captioned rulemaking. As the national trade association for tire manufacturers that produce tires in the U.S., USTMA has a direct interest in this rulemaking. USTMA members operate manufacturing facilities in 17 states, employ nearly 100,000 workers and generate annual sales of more than \$27 billion. Our member companies include Bridgestone Americas; Continental Tire the Americas, LLC; Cooper Tire & Rubber Company; Giti Tire (USA) Ltd.; The Goodyear Tire & Rubber Company; Hankook Tire America Corp.; Kumho Tire U.S.A., Inc.; Michelin North America, Inc.; Pirelli Tire LLC; Sumitomo Rubber Industries; Toyo Tire Holdings of Americas Inc. and Yokohama Tire Corporation.

USTMA discovered a typographical error in FMVSS 119. Section 6 of the regulation lays out the requirements that must be met by each tire subject to the regulation. In particular, S6.3 provides the requirements for high speed performance. The section references, the applicable test procedures and includes a reference to S7.3. S7.3 actually contains the test procedures for strength performance, not high speed performance. The test procedures for high speed performance instead are contained in S7.4. Therefore, USTMA recommends the following amendment FMVSS 119 to correct this typographical error:

S6.3 High speed performance. When tested in accordance with the procedures of ~~S7.3S.7.4~~, a tire shall meet the requirements set forth in S6.1.1 and S6.1.2(a) and (b). However, this requirement applies only to motorcycle tires and to non-speed-restricted tires of nominal rim diameter code 14.5 or less marked load range A, B, C, or D.

Again, we appreciate that the Agency is moving forward with proposing these corrections and clarifications. Thank you for the opportunity to provide these comments. Should you have any questions or require further information, please contact me at 202-682-4839 or tnorberg@ustires.org.

Sincerely,



Tracey Norberg
Senior Vice President & General Counsel
U.S. Tire Manufacturers Association