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July 14, 2014

David Hines, Acting Associate Administrator for Rulemaking  
U.S. Department of Transportation  
National Highway Traffic Safety Administration  
1200 New Jersey Ave, SE  
Washington D.C., 20590

**PETITION ON REVISIONS  
TO 571.109 AND 571.139 REGARDING  
EQUIVALENT "kPa" INFLATION PRESSURES FOR T-TYPE TIRES**

Pursuant to Section 552.3(a) of Title 49 of the Code of Federal Regulations, the petitioner, The Tire and Rim Association, Inc. (TRA), whose purpose is to establish and promulgate interchangeability standards for tire, rims and allied parts, representing tire, rim and allied parts manufacturers in the United States,<sup>1</sup> respectfully requests the Administrator to "commence a proceeding respecting the . . . amendment . . . of a motor vehicle safety standard." In particular, TRA requests the National Highway Traffic Safety Administration (NHTSA) to allow 415 kPa as an optional inflation pressure to marking 420 kPa with 60 psi for T-type tire in both FMVSS 571.109 and 571.139.

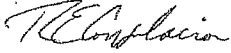
TRA previously submitted a petition requesting that 415 kPa be an allowable option to marking 420 kPa with 60 psi for T-type tires since 415 kPa is the official equivalent of 60 psi in the TRA Equivalent kPa/psi Table and in ISO TR 29846. At the time, NHTSA indicated that they were reluctant to recognize this optional pressure since it was not currently specified by TRA for T-type tires in any of TRA's publications.

<sup>1</sup> TRA's membership includes all of the country's major tire, rim and allied parts manufacturers: BKT USA; Bridgestone Americas; Carlisle Tire & Wheel Company; Cheng Shin Rubber USA; Continental Tire the Americas; Cooper Tire & Rubber Company; Duro Tire Corporation; The Goodyear Tire & Rubber Company; Hankook Tire Manufacturing; Hoosier Racing Tire; JK Tyre and Industries; Kumho Tire Company; Michelin North America; Mitas Tires North America; Pirelli Tire North America; Specialty Tires of America; SRI America; Superior Tire & Rubber; Toyo Tire Holdings of Americas; The Yokohama Rubber Company; Accuride Wheels; Advance Wheel; ALCOA Wheel Products; GKN Armstrong; Honeywell Aerospace; Hutchinson Industries; Maxion Wheels; OTR Wheel Engineering; Prime Wheel; Titan International; Topy America; Dill Air Controls Products; Haltec Corporation; Pacific Industries Air Controls; Schrader-Bridgeport International.

TRA now specifies 415 kPa as an allowable inflation pressure for T-type tires in the 2014 TRA Year Book. Attached are the data table pages from the 2014 TRA Year Book for T-type tires showing 415 kPa and 420 kPa as inflation pressures.

Please feel free to contact me with any further questions that the Agency may have regarding this petition. We appreciate the Agency's consideration of this petition to update FMVSS 571.109 and 571.139 to be consistent with current TRA and ISO standards.

Regards,



Rudy Consolacion, Executive Vice President

attachments

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**"T" TYPE SPARE TIRES FOR  
TEMPORARY USE ON PASSENGER VEHICLES  
TIRE AND RIM ASSOCIATION STANDARD**

**TABLE PCT-1B**  
Millimeters/Inches

TIRE SIZE DESIG- NATION	TIRE LOAD LIMITS						MEASUR- ING RIM WIDTH	DESIGN NEW TIRE		**MAX. GROWN TIRE		*** MINIMUM SIZE FACTOR	APPROVED RIM CONTOURS
	LIGHT LOAD			STANDARD LOAD				SECTION WIDTH	OVERALL DIAMETER	OVERALL WIDTH	OVERALL DIAMETER		
	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.							
<b>90 SERIES</b>													
T125/90*15	--	--	--	1565	710	96	4.00	131 5.16	607 23.90	145 5.71	625 24.61	727 28.62	4T, 4 1/2T
T135/90*15	--	--	--	1764	800	100	4.00	138 5.43	625 24.61	152 5.98	645 25.39	752 29.61*	4T, 4 1/2T, 5J
T125/90*16	--	--	--	1653	750	98	4.00	131 5.16	632 24.88	145 5.71	650 25.59	752 29.61	4T, 4 1/2T
T135/90*16	--	--	--	1874	850	102	4.00	138 5.43	650 25.59	152 5.98	670 26.38	777 30.59	4T, 4 1/2T, 5J
T145/90*16	--	--	--	2094	950	106	4.00	145 5.71	668 26.30	160 6.30	688* 27.09	801 31.54	4T, 4 1/2T, 5J
T155/90*16	1764	800	100	2337	1060	110	4.00	152 5.98	686 27.01	168 6.61	710 27.95	825 32.48	4T, 4 1/2T, 5J, 5 1/2J
T135/90*17	1477	670	94	1929	875	103	4.00	138 5.43	676 26.61	152 5.98	696 27.40	803 31.61	4T, 4 1/2T, 5J
T145/90*17	1653	750	98	--	--	--	4.00	145 5.71	694 27.32	160 6.30	714 28.11	827 32.56	4T, 4 1/2T, 5J
T155/90*17	1819	825	101	2469	1120	112	4.00	152 5.98	712 28.03	168 6.61	736 28.98	851 33.50	4T, 4 1/2T
T165/90*17	2039	925	105	--	--	--	4.00	159 6.26	730 28.74	175 6.89	754 29.69	875 34.45	4T, 4 1/2T, 5J, 5 1/2J, 6J
T175/90*17	2271	1030	109	--	--	--	4.50	172 6.77	748 29.45	190 7.48	774 30.47	905 35.63	4 1/2T, 5J, 5 1/2J, 6J
T155/90*18	1929	875	103	2535	1150	113	4.00	152 5.98	737 29.02	168 6.61	761 29.96	876 34.49	4T, 4 1/2T, 5J, 5 1/2J
T165/90*18	2149	975	107	2756	1250	116	4.00	159 6.26	755 29.72	175 6.89	779 30.67	900 35.43	****4T, 4 1/2T, 5J, 5 1/2J, 6J
T175/90*18	2403	1090	111	--	--	--	4.50	172 6.77	773 30.43	190 7.48	799 31.46	930 36.61	****4 1/2T, 5J, 5 1/2J, 6J

See notes on page 1-46.

(continued)

**"T" TYPE SPARE TIRES FOR  
TEMPORARY USE ON PASSENGER VEHICLES  
TIRE AND RIM ASSOCIATION STANDARD**

**TABLE PCT-1B (continued)**  
Millimeters/Inches

TIRE SIZE DESIG- NATION	TIRE LOAD LIMITS						MEASUR- ING RIM WIDTH	DESIGN NEW TIRE		**MAX. GROWN TIRE		*** MINIMUM SIZE FACTOR	APPROVED RIM CONTOURS
	LIGHT LOAD			STANDARD LOAD				SECTION WIDTH	OVERALL DIAMETER	OVERALL WIDTH	OVERALL DIAMETER		
	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.							
<b>80 SERIES</b>													
T105/80*13	--	--	--	1047	475	82	4.00	116 4.57	498 19.61	130 5.12	516 20.31	604 23.78	4T
T125/80*13	--	--	--	1389	630	92	4.00	131 5.16	530 20.87	145 5.71	548 21.57	651 25.63	4T, 4 1/2T
T135/80*14	--	--	--	1609	730	97	4.00	138 5.43	572 22.52	152 5.98	590 23.23	699 27.52	4T, 4 1/2T, 5J
T125/80*15	--	--	--	1521	690	95	4.00	131 5.16	581 22.87	145 5.71	599 23.58	702 27.64	4T, 4 1/2T
T135/80*15	--	--	--	1764	800	100	4.00	138 5.43	597 23.50	152 5.98	615 24.21	724 28.50	4T, 4 1/2T, 5J
T125/80*16	--	--	--	1609	730	97	4.00	131 5.16	606 23.86	145 5.71	624 24.57	727 28.62	4T, 4 1/2T
T135/80*16	--	--	--	1819	825	101	4.00	138 5.43	622 24.49	152 5.98	640 25.20	749 29.49	4T, 4 1/2T, 5J
T145/80*16	1521	690	95	2039	925	105	4.00	145 5.71	638 25.12	160 6.30	656 25.83	772 30.39	4T, 4 1/2T, 5J
T155/80*16	--	--	--	2271	1030	109	4.00	152 5.98	654 25.75	168 6.61	674 26.54	794 31.26	4T, 4 1/2T, 5J, 5 1/2J
T125/80*17	--	--	--	1709	775	99	4.00	131 5.16	632 24.88	145 5.71	650 25.59	753 29.65	****4T, 4 1/2T
T135/80*17	--	--	--	1929	875	103	4.00	138 5.43	648 25.51	152 5.98	666 26.22	775 30.51	4T, 4 1/2T, 5J
T145/80*17	1609	730	97	2149	975	107	4.00	145 5.71	664 26.14	160 6.30	682 26.85	798 31.42	4T, 4 1/2T, 5J
T155/80*17	1819	825	101	2403	1090	111	4.00	152 5.98	680 26.77	168 6.61	700 27.56	820 32.28	4T, 4 1/2T, 5J, 5 1/2J
T165/80*17	1984	900	104	2679	1215	115	4.00	159 6.26	696 27.40	175 6.89	716 28.19	842 33.15	4T, 4 1/2T, 5J, 5 1/2J, 6J

See notes on page 1-46.

(continued)

**"T" TYPE SPARE TIRES FOR  
TEMPORARY USE ON PASSENGER VEHICLES  
TIRE AND RIM ASSOCIATION STANDARD**

**TABLE PCT-1B (continued)**  
Millimeters/Inches

TIRE SIZE DESIG- NATION	TIRE LOAD LIMITS						MEASU- RING RIM WIDTH	DESIGN NEW TIRE		**MAX. GROWN TIRE		*** MINIMUM SIZE FACTOR	APPROVED RIM CONTOURS
	LIGHT LOAD			STANDARD LOAD				SECTION WIDTH	OVERALL DIAMETER	OVERALL WIDTH	OVERALL DIAMETER		
	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.							
<b>80 SERIES (CONTINUED)</b>													
T135/80*18	--	--	--	1984	900	104	4.00	138 5.43	673 26.50	152 5.98	691 27.20	800 31.50	****4T, 4 1/2T, 5J
T145/80*18	1709	775	99	--	--	--	4.00	145 5.71	689 27.13	160 6.30	707 27.83	823 32.40	4T, 4 1/2T, 5J
T155/80*18	1874	850	102	2535	1150	113	4.00	152 5.98	705 27.76	168 6.61	725 28.54	845 33.27	4T, 4 1/2T, 5J, 5 1/2J
T175/80*18	--	--	--	3086	1400	120	4.50	172 6.77	737 29.02	190 7.48	761 29.96	895 35.24	4 1/2T, 5J, 5 1/2J, 6J
<b>70 SERIES</b>													
T105/70*14	--	--	--	1102	500	84	4.00	116 4.57	504 19.84	130 5.12	522 20.55	609 23.98	4T
T115/70*14	--	--	--	1235	560	88	4.00	123 4.84	518 20.39	137 5.39	536 21.10	630 24.80	4T
T125/70*14	--	--	--	1433	650	93	4.00	131 5.16	532 20.94	145 5.71	550 21.65	652 25.67	4T, 4 1/2T
T115/70*15	--	--	--	1323	600	90	4.00	123 4.84	543 21.38	137 5.39	561 22.09	655 25.79	4T
T125/70*15	--	--	--	1521	690	95	4.00	131 5.16	557 21.93	145 5.71	575 22.64	677 26.65	4T, 4 1/2T
T135/70*15	--	--	--	1709	775	99	4.00	138 5.43	571 22.48	152 5.98	589 23.19	698 27.48	4T, 4 1/2T, 5J
T115/70*16	--	--	--	1389	630	92	4.00	123 4.84	568 22.36	137 5.39	586 23.07	680 26.77	4T
T125/70*16	--	--	--	1565	710	96	4.00	131 5.16	582 22.91	145 5.71	600 23.62	702 27.64	4T, 4 1/2T
T135/70*16	--	--	--	1764	800	100	4.00	138 5.43	596 23.46	152 5.98	614 24.17	723 28.46	4T, 4 1/2T, 5J
T125/70*17	--	--	--	1653	750	98	4.00	131 5.16	608 23.94	145 5.71	626 24.65	728 28.66	4T, 4 1/2T
T135/70*17	1389	630	92	1874	850	102	4.00	138 5.43	622 24.49	152 5.98	640 25.20	749 29.49	4T, 4 1/2T, 5J
*T145/70*17	1565	710	96	2094	950	106	4.00	145 5.71	636 25.04	160 6.30	654 25.75	770 30.31	4T, 4 1/2T, 4.50B, 5J

See notes on page 1-46.

(continued)

**"T" TYPE SPARE TIRES FOR  
TEMPORARY USE ON PASSENGER VEHICLES  
TIRE AND RIM ASSOCIATION STANDARD**

Table PCT-1B (continued)  
Millimeters/Inches

TIRE SIZE DESIGNATION	TIRE LOAD LIMITS						MEASURING RIM WIDTH	DESIGN NEW TIRE		**MAX. GROWN TIRE		*** MINIMUM SIZE FACTOR	APPROVED RIM CONTOURS
	LIGHT LOAD			STANDARD LOAD				SECTION WIDTH	OVERALL DIAMETER	OVERALL WIDTH	OVERALL DIAMETER		
	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.	60 psi (lbs.)	#415/420 kPa (kg)	LOAD INDEX NO.							
<b>70 SERIES (CONTINUED)</b>													
T155/70*17	--	--	--	2337	1060	110	4.00	152 5.98	650 25.59	168 6.61	668 26.30	791 31.14	****4T, 4 1/2T, 5J, 5 1/2J
T165/70*17	--	--	--	2601	1180	114	4.00	159 6.26	664 26.14	175 6.89	682 26.85	811 31.93	****4T, 4 1/2T, 5J, 5 1/2J, 6J
T135/70*18	--	--	--	1984	900	104	4.00	138 5.43	647 25.47	152 5.98	665 26.18	774 30.47	****4T, 4 1/2T, 5J
T145/70*18	--	--	--	2149	975	107	4.00	145 5.71	661 26.02	160 6.30	679 26.73	796 31.34	****4T, 4 1/2T, 5J
T155/70*18	--	--	--	2469	1120	112	4.00	152 5.98	675 26.57	168 6.61	693 27.28	816 32.13	****4T, 4 1/2T, 5J, 5 1/2J
T165/70*18	--	--	--	2756	1250	116	4.00	159 6.26	689 27.13	175 6.89	707 27.83	836 32.91	****4T, 4 1/2T, 5J, 5 1/2J, 6J
<b>65 SERIES</b>													
T145/65*18	--	--	--	1929	875	103	4.00	145 5.71	645 25.39	160 6.30	663 26.10	780 30.71	4T, 4 1/2T, 5J
<b>60 SERIES</b>													
T135/60*16	--	--	--	1389	630	92	4.00	138 5.43	568 22.36	152 5.98	586 23.07	696 27.40	4T, 4 1/2T, 5J
T185/60*17	1874	850	102	--	--	--	5.00	184 7.24	654 25.75	203 7.99	672 26.46	826 32.52	4 1/2T, 5J
T135/60*18	--	--	--	1565	710	96	4.00	138 5.43	619 24.37	152 5.98	637 25.08	747 29.41	4T, 4 1/2T, 5J
<b>55 SERIES</b>													
T185/55*18	--	--	--	2271	1030	109	5.00	184 7.24	661 26.02	203 7.99	679 26.73	833 32.80	****4 1/2T, 5J, 5 1/2J, 6J, 6 1/2J

\*Tire size designation will include R (Radial Ply) or D (Diagonal or Bias Ply).

\*\*Maximum dimensions of grown tires in service for use by vehicle manufacturers in designing for tire clearances.

\*\*\*Based on Measuring Rim Width.

\*\*\*\*For approved rim contours for these sizes, "J" and "B" rims are acceptable where "T" is specified, and "B" rims are acceptable where "J" is specified

# The Tire and Rim Association has adopted an official equivalency of kPa to psi values. The first number reflects the official conversion and the second number reflects the previous value. However, as of the printing of this Year Book, 420 kPa is the only recognized inflation pressure in the USA National Highway Traffic Safety Administration regulations.

NOTES 1: In order to provide for design differences and manufacturing tolerances:

(Calculate in S.I. units and round to closest mm, then convert to Customary units.)

a) Overall new tire widths may exceed the above design new tire section widths by 7% or 10mm (whichever is larger).

b) Overall new tire diameters may exceed the above design new tire diameters by 7% of the difference between the design new tire overall diameters and the nominal rim diameters or +16 mm (whichever is larger).

2: Rim valves for tubeless operations: TR 416S, TR 413.

3: Valve holes must conform to standards shown on page 8-69.

4: See Section 8 for 4T and 4 1/2T rim contour dimensions.

5: J contours are also approved in the same widths wherever T rim contours are shown in above tables.

FOR RIM AND WHEEL LOAD INFORMATION, SEE NOTE 9, PAGE 1-41.