

February 14, 2020

Docket Management Facility

Docket No. NHTSA-2019-0011

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U.S. Department of Transportation

National Highway Traffic Safety Administration

1200 New Jersey Ave, SE.,

Washington D.C., 20590

SUBMITTED ELECTRONICALLY via www.regulations.gov

TIA Comments in Response to Advanced Notice of Proposed Rulemaking: Federal Motor Vehicle Safety Standards; Tires

On December 19, 2019, the National Highway Traffic Safety Administration published an Advanced Notice of Proposed Rulemaking (ANPRM) and request for public comment on Federal Motor Vehicle Safety Standards; Tires.

The Tire Industry Association (TIA) is submitting these comments on behalf of its members. Thank you for the opportunity to provide comments.

The Tire Industry Association is an international non-profit 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.

The mission of TIA is to promote tire safety through training and education, to act as the principal advocate in government affairs and to enhance the image and professionalism of the industry so that our member businesses may be more successful. TIA has more than 13,000 members from all 50 states and around the globe. As the industry leader in tire service technician training, TIA has educated more than 160,000 people since 1997.

NHTSA is issuing this ANPRM to seek comment on provisions contained in the Federal Motor Vehicle Safety Standards for tires. NHTSA is reviewing existing regulations to determine if updates are necessary to keep pace with new technology.



Maryland Office:

1532 Pointer Ridge Place 800.876.8372

Suite G 301.430.7280

Bowie, Maryland 301.430.7283 f

20716-1883

NHTSA seeks comment on matters related to the existing strength test, the bead unseating resistance test, and the tire endurance test. Lastly, the agency seeks comment on the current use and relevance of some tire marking regulations and other matters related to new tire technologies.

Comments to this notice will inform NHTSA as it considers regulatory reform aimed at reducing regulatory burden while maintaining existing safety levels for motor vehicle tires.

TIA will focus comments on tire marking regulations.

Are there benefits to all required tire markings, specifically, ply description and ply rating; 'tubeless' marking, and 'radial' marking and seeks information on the impacts of these marking requirements on motor vehicle safety?

As the leading training authority, TIA uses the ply description marking on the sidewall to warn technicians of a potential zipper rupture on an all-steel light truck tire. Most light truck tires have fabric sidewall plies, which means the technician does not need to follow USTMA zipper rupture inspection and inflation procedures. When the light truck tire has a steel sidewall ply, it must be handled differently because underinflation and/or overloading can cause the steel cords to become fatigued due to over-flexing. If the steel sidewall ply is damaged, the tire may experience a circumferential separation in the sidewall during inflation and release a potentially fatal blast of pressurized air. When technicians follow the USTMA zipper rupture inspection and inflation procedures, the hazards are minimized because the tire is constrained within a restraining device and inflated with an OSHA-compliant inflation device that ensures the technician can remain outside the trajectory of the sidewall during inflation.

Knowing the ply material is imperative for workplace safety when it comes to inflating light truck tires. Without that information molded on the sidewall, technicians will not know if the tire needs to be inspected and inflated in accordance with USTMA recommendations. There is no way that technicians can determine if a tire has fabric or steel sidewall plies without that marking on the sidewall.

The tire retread and repair industries also rely on the ply description markings to determine how the tire will be retreaded or repaired. For example, light truck tires with steel sidewall plies are better candidates for retreading, so knowing that information is important. Likewise, the number of tread plies has an impact on how the tire is retreaded and/or repaired. Removing the information from the sidewall will make tires less retreadable and/or repairable.

Additionally, the tire recycling industry frequently relies on sidewall markings to identify the material content within the tire. For example, the number of steel belts and the type of material used for the sidewall plies are all considered when processing the end of life tires into valued recycled products. This is particularly true when Kevlar is used as a reinforcing material for the tread plies. For example, many tire recycling processors use magnets to remove the steel from the shredded end of life tire. Kevlar cannot be removed in this manner and often creates "contamination" when processing the tire into smaller size crumb rubber particles.



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When the recycler knows that the tire has a Kevlar ply in the tread, they can segregate the Kevlar tires from the others and process them into products that have less stringent requirements, like tire-derived fuel or tire-derived aggregate. Removing the ply description marking from the sidewall will make passenger and light truck tires less recyclable.

For these reasons, TIA recommends that NHTSA continue to require ply description on passenger and light truck tires.

Maximum tire load capacity must be marked on the sidewall, so the load index or load range is sufficient. TIA believes that most passenger tires use load index to indicate the maximum capacity and light truck tires use load range. We are not aware of any passenger or light truck tires that use ply rating as the only indication of the maximum load capacity, but cannot confirm they do not exist. Regardless, ply rating is an outdated term that is unnecessary as long as the load index or load range is molded on the sidewall.

When a tire sidewall is marked “tubeless”, the technician assumes it was not designed to be operated with an innertube. On the other hand, if the sidewall is marked “tube-type”, then the technician knows the tire requires a tube and the tire cannot be operated tubeless. TIA does not believe there are a significant number of tube-type tires covered by FMVSS 139, but again, we cannot say they do not exist. If tube-type tires are still commercially available and covered by FMVSS 139, then the markings must remain.

On the other hand, if all of the tires covered by FMVSS 139 are tubeless, then removing the marking would appear to be reasonable as long as the tire manufacturers agree that every tire is both tubeless and tube-type. If the manufacturers do not agree that all tubeless tires can be operated with an innertube, then removing the markings creates safety concerns if a technician installs an innertube in a tubeless tire. For example, if installing a tube in a tubeless tire creates excessive heat, then the tire may fail in service. Without any direction from the manufacturers, technicians are left to guess whether or not a tube is necessary, unnecessary, or optional. Given the potential for various safety issues, TIA recommends that the “tubeless” or “tube-type” markings remain on the sidewall so there is no confusion.

Molding the word “radial” on the sidewall is redundant because the tire size designation will include the letter “R” if the tire has radial construction. Any other symbol in the size immediately before the bead diameter reflects a bias ply tire. Most people in the tire industry will check for radial or bias construction in the tire size, so TIA does not object to the removal of the word “radial” from the sidewall.

In conclusion, TIA believes there are benefits to most of the tire markings currently required in FMVSS 139 for motor vehicle safety, while the word “radial” is obsolete. Removing important information from the sidewall creates safety risks for technicians as well as motorists, and it will make tires less retreadable and/or repairable. TIA recommends that NHTSA continue to require ply description on passenger and light truck tires. TIA concludes that ply rating is not necessary as long as the load index or load range is molded on the sidewall. TIA recommends that the “tubeless” or “tube-type” markings remain on the sidewall so there is no confusion or improper repairs performed. Finally, TIA does not object to the removal of the word “radial” from the sidewall.



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Thank you for the opportunity to submit comments on the Advanced Notice of Proposed Rulemaking
Please do not hesitate to contact TIA to provide further information and feedback from our members.

Sincerely,

Roy Littlefield
Director of Government Affairs
Tire Industry Association

Kevin Rohlwing
Senior Vice President of Training
Tire Industry Association



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