ETRTO comments on NHTSA Advanced Notice of Proposed Rulemaking (ANPRM)

18 February 2020

NHTSA Questions: Strength (Plunger Energy) Test

- **Can the tire strength test be repealed, replaced, or modified without negatively affecting safety?** If not, what potential safety issues should the agency be focused on and how could such safety issues be mitigated? Explain your perspective, include specifics and data supporting your response.
- ***Repealing.*** What are the practical and safety implications of eliminating the tire strength test? Should the test be eliminated for all low-profile tires, all radial tires, or all tires without adversely affecting safety? What are the estimated cost savings of repealing this provisions within the standards?
- ***Modifying*****.** What specific changes should the agency consider? What are the estimated cost savings of implementing such modifications? In addition, provide comments to the following possible modifications:
  - Specify and allow use of deep-well test rims.
  - Specify new minimum breaking energy (performance value) to apply to low-profile radial tires. How should NHTSA define the term "low-profile tires"?
  - Are there any ambiguities in the term "bottomed out" and, if so, is there any suggestion on how to define the term?
- ***Replacing*****.** What other test procedures(s) are available or can be developed to replace the strength test (currently used to evaluate the strength of tire materials)? Should a different procedure be used for low-profile tires? Please provide sufficient details about each procedure to permit the agency to analyze and determine whether the procedure is appropriate and feasible, and whether the procedure is objective and repeatable. What are the estimated costs of implementing such procedures?
- **How many bias-ply tires are sold in the U.S. annually?** Will manufacturers continue selling bias-ply tires for use on motor vehicles? Should NHTSA keep the strength test for bias-ply tires?

ETRTO supports the elimination of the test for radial and run flat tyres, considering that relevant UN Regulations do not require it and that there is no evidence that there are more consumer complaints in regions applying the UN Regulations.

NHTSA Questions: Bead Unseating Test

- **Can the bead unseating resistance test be repealed, replaced, or modified without negatively affecting safety?** If not, what potential safety issues should the agency be focused on and how could such safety issues be mitigated? Explain your perspective in detail and include any available data in support of your response.
- ***Repealing.*** What are the practical and safety implications of eliminating the tire bead unseating resistance test? Could the test be eliminated for all low-profile tires, all radial tires, all tires without adversely affecting safety? What are the estimated cost savings of repealing this provision within the standards?
- ***Modifying*****.** What specific changes should the agency consider? What are the estimated cost savings of implementing such modifications? NHTSA seeks specific comment on the following modification:
  - Adopt *ASTM F2663*, to apply FMVSS No. 109 procedure to tires with rim diameter code up to 30.42
- ***Replacing*****.** What other test procedures are available or can be developed to replace the bead unseating resistance test? Should a different procedure be used for low-profile tires?
- Please provide sufficient details about each procedure to permit the agency to analyze and determine whether the procedure is appropriate and feasible, and whether the procedure is objective and repeatable.
- What are the **estimated costs** of implementing such procedures?

ETRTO supports the elimination of the test for radial and run flat tyres, considering that relevant UN Regulations do not require it and that there is no evidence that there are more consumer complaints in regions applying the UN Regulations.

NHTSA Questions: Endurance Test

NHTSA seeks data and information about the test conditions and performance requirements for the endurance test in FMVSS No. 139.
What are the potential **cost savings associated with the removal of chunking as a damage condition for the endurance test**? Please describe the cost elements and provide supporting data for the estimates.
Are there negative safety consequences of removing chunking as a relevant damage condition for the endurance test? Please explain.

ETRTO recognized the concerns about chunking as a failure mode appearing in the endurance test, even at 110 km/h. This failure mode is not observed in the real use conditions and chunking should therefore be suppressed as a failure mode.

ETRTO considers it important to investigate on how to improve the test method aiming to reduce or eliminate the chunking without reducing the severity of the endurance test.

NHTSA Questions: Tire Markings

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? If there are potential safety issues associated with the removal of any required markings, how could such safety issues be mitigated? Explain your perspective, include specifics and any data supporting your response.

What are the **potential cost savings** associated with the removal of these markings (ply description and ply rating; 'tubeless' marking, and 'radial' marking)? Please provide any supporting data for the estimates.

ETRTO supports the transposition of the tyre marking provisions of UN GTR No 16 to FMVSS.

NHTSA Questions: Tire Innovations

- NHTSA seeks comments on the following: Please provide information about **emerging tire technologies and trends** that may impact motor vehicle safety.
- **Do existing regulations impede tire innovation(s**)? Please explain.
- **What regulatory actions are needed to remove impediment(s) to tire innovation without adversely affecting safety?**

ETRTO supports that Regulations should be technology neutral.