

Comment from Tire Retread & Repair Information Bureau

The Tire Retread & Repair Information (TRIB) is submitting these comments on behalf of our members. Thank you for the opportunity to provide comments.

TRIB is a non-profit trade association whose mission is to promote and defend the retreading industry and provide information about proper tire repair. Our members include companies that manufacture, repair, sell, and service retreaded tires (including passenger and light truck tires); suppliers who provide equipment, material or services to these retread & repair companies; and casing dealers who help provide the input product to be retreaded.

TRIBs comments below will focus specifically on potential changes to tire marking regulations and the impact it will have on retreaders and the following question posed by NHTSA: "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?"

TRIBs member companies (with the Tire Industry Associations training) use the ply description marking on the sidewall to warn technicians of a potential zipper rupture on an all-steel light truck tire. Light truck tires with steel sidewall plies or tires with fabric sidewall plies need to be handled differently by technicians for inspection and inflation, including constraining the tire 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. Therefore, knowing the ply material is imperative for workplace safety as there is no way for technicians to determine if a tire has fabric or steel sidewall plies without that marking on the sidewall.

The tire retread and repair companies also rely on the ply description markings to determine how the tire will be retreaded or repaired. It is important for retreaders to understand whether the tires have steel or fabric sidewall plies as well as the number of tread plies to decide whether and how they will properly repair and retread these tires. Removing this information from the sidewall will make these tires less retreadable and/or repairable.

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

At the same time, ply rating is an outdated term and is unnecessary for retreaders to successfully retread these tires. Our member companies are happy for ply rating to be removed from the sidewall as long as either the load index or load range is molded on the sidewall.

TRIB's members also feel that 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. TRIB does not object to the removal of the word radial from the sidewall.

In conclusion, TRIB 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. TRIB recommends that NHTSA continue to require ply description on passenger and light truck tires. TRIB concludes that ply rating is not necessary as long as the load index or load range is molded on the sidewall. Finally, TRIB does not object to the removal of the word radial from the sidewall.

Thank you for the opportunity to submit comments on behalf of our members.

Sincerely,

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