



The Japan Automobile Tyre Manufacturers Association
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February 18, 2020

Honorable James Clayton Owens
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Subject: JATMA Petition on the Advance Notice of Proposed Rulemaking of Federal Motor Vehicle Safety Standards: Tires
[Docket No. NHTSA-2019-0011-0001, RIN: 2127-AL96]

Dear Mr. Owens,

We, the Japan Automobile Tyre Manufacturers Association Inc., are representing the tire manufacturers of Japan including Bridgestone Corporation, Sumitomo Rubber Industries, Ltd., The Yokohama Rubber Co., Ltd., and Toyo Tire Corporation.

We are pleased to be given this opportunity to comment on the “Advance Notice of Proposed Rulemaking of Federal Motor Vehicle Safety Standards: Tires”, hereinafter referred to as ANPRM.

We will be greatly appreciated if you could peruse our comments and take them into consideration.

First of all, we fully support the petition submitted by the U.S. Tire Manufacturers Association, hereinafter referred to as USTMA.

In addition to the USTMA petition, we hereby petition the ANPRM as follows.

1. Tire Strength Test and Tire Bead Unseating Resistance Test

JATMA supports to repeal Tire Strength Test and Tire Bead Unseating Resistance Test from FMVSS 139 because these tests were designed for bias ply tires.



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From our experience, we understand that repealing these test requirements from radial tires do not have a negative impact on safety or performance.

In the past, the technical requirement for tire safety was the Japanese Industrial Standards(JIS), which was almost same as FMVSS139.

Japan acceded the 1958 Agreement in 1998, and subsequently, Japan gradually adopted the UN Regulations. In 2003, Japan adopted UN Regulations No. 30 and No. 54 and they were implemented from 2005 because already ratio of radial tire in the market was more than 90%. By adopting UN Regulations, Tire Strength Test and Tire Bead Unseating Resistance Test were no longer required.

Nevertheless, since adoption of the UN Regulations, the number of traffic accident fatalities has not increased in Japan.

Consequently, we believe that UN Regulations can ensure traffic safety. In terms of tires, if the market is mainly radial construction, UN Regulation for tires can ensure safety.

2. Transposition of GTR 16

JATMA respects NHTSA's great contribution for the establishment of GTR 16.

As the next step in global harmonization activities, JATMA support to transpose GTR 16 into FMVSS, especially the marking requirement and high speed test condition.

Your kind consideration would be highly appreciated.

Respectfully submitted,

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Secretary General

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