

Comment from Lawrence Beyer

REVISION OF TESTING STANDARD

For

FMVSS 138

Tire Pressure Monitoring System

Comment for

Docket ID: NHTSA-2020-0109

This comment suggests the revision of the testing location requirement for this standard. This comment is submitted by NAVTA, the North American Vehicle Trade Associates.

The only location at which the regulations allow testing certification is on the Southern Loop of the Treadwear Test Course near San Angelo, Texas.

This comment does not suggest any change to the temperature or pavement condition requirements of this regulation, merely to allow certification testing on any suitable roadway.

There is no justification found as to why this location was deemed the sole acceptable location on the planet to conduct this test. There is no specialized equipment required, nor is there any reason that the road surface of the Treadwear Test Course provides a unique surface for the tests.

Basically the test involves verification that the system functions as required, with a low pressure and malfunction segment. Pressure is pressure and a road is a road.

ECONOMIC IMPACT:

Obviously there is a significant cost to certification of conformity for this standard. The vehicle must be transported to San Angelo and the testing conditions must be within the parameters. These costs impact small manufacturers more than large volume manufacturers. Additionally, Registered Importers who wish to import vehicles without a U.S. certified TPMS are required to transport and test individual vehicles to this site in order to document compliance.

REPEATABLE RESULTS:

The important variables which could affect the test are ambient temperature and roadway humidity. Temperature changes would affect tire pressure. However, the regulations specify the parameters of these variables. So long as the testing conditions are within those parameters the roadway should not make a difference. The road surface should be well maintained and paved.

NHTSA may, at its option, conduct confirmatory tests at San Angelo, or at another location.

EFFECT OF CHANGE:

Should NHTSA adopt the suggestion of this comment, manufacturers will be more likely to conduct additional tests of their products.

This will streamline the compliance process and enable small manufacturers and importers to economically compete.