



The Japan Automobile Tyre Manufacturers Association  
33rd Mori Bldg., 3-8-21 Toranomom, Minato-ku, Tokyo 105-0001  
TEL: +81-3-3435-9091 FAX: +81-3-3435-9097

September 7, 2021

David Jasinski, Office of the Chief Counsel  
Hisham Mohamed, Office of Crash Avoidance Standards  
National Highway Traffic Safety Administration (NHTSA)  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Subject: JATMA Comments on the Notice of proposed rulemaking of Standard Reference Test Tire

[Docket No. NHTSA-2020-0067, RIN: 2127-AL92]

Dear Mr. Jasinski and Mr. Mohamed,

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 “Notice of Proposed Rulemaking of Standard Reference Test Tire”, hereinafter referred to as NPRM.

JATMA deeply appreciates that NHTSA has issued this NPRM proposing to replace ASTM E 1136 with ASTM F2493 for Standard Reference Test Tire.

JATMA encourages NHTSA to expedite publication of the final rule as ASTM E 1136 production has been ceased by the sole manufacturer of these testing tires, and no ASTM E 1136 tires are currently available for tire manufacturers to perform compliance tests of FMVSS.

Moreover, we fully support the petition submitted by the U.S. Tire Manufacturers Association.

Your kind consideration would be highly appreciated.



The Japan Automobile Tyre Manufacturers Association

33rd Mori Bldg., 3-8-21 Toranomom, Minato-ku, Tokyo 105-0001

TEL: +81-3-3435-9091 FAX: +81-3-3435-9097

Yours very truly,

大 高 悟

---

Satoru Otaka

Secretary General

The Japan Automobile Tyre Manufacturers Association, INC.

33rd Mori Bldg., 3-8-21 Toranomom, Minato-ku, Tokyo, JAPAN 105-0001

E-mail; [info-i@jatma.or.jp](mailto:info-i@jatma.or.jp) Tel; +81-3-3435-9094 Fax; +81-3-3435-9097