



September 7, 2021

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

**RE: Notice of Proposed Rulemaking : Standard Reference Test Tire  
49 CFR Parts 571 and 575; [Docket No. NHTSA-2020-0067]; RIN 2127-AL92**

Dear Mr. Jasinski and Mr. Mohamed:

Michelin North America, Inc. (“Michelin”) appreciates the opportunity to offer comments on the National Highway Traffic Safety Administration’s (“NHTSA”) Notice of Proposed Rulemaking (“NPRM or “Notice”) seeking comment on proposed amendments to several Federal Motor Vehicle Safety Standards and Consumer Information Regulations to update the Standard Reference Test Tire (“SRTT”) used therein.

Michelin concurs with and joins the comments filed in response to this NPRM by the U.S. Tire Manufacturers Association (“USTMA”). In addition, Michelin offers its own separate comments on the following issues, which are discussed in greater detail below:

- Availability of SRTTs: NHTSA was notified in May 2015 of the necessity to discontinue the ASTM E1136 (14-inch SRTT) production in the future. Michelin reconfirms that this production ceased in the fall of 2020 and that its stock has been depleted as of July 2021. Michelin also confirms that production of ASTM F2493 (16-inch SRTT), which became available in 2009, is ongoing, and an appropriate stock continues to be maintained.
- Surface Friction Measurement: Michelin agrees that ASTM E1337-19 should be used for Surface Friction Measurement with the Peak Friction Coefficient (PFC) values derived from its correlation equation between the ASTM E1136 (14-inch SRTT) and the ASTM F2493 (16-inch SRTT) as shown in the table of the section A.1. of the NPRM.

- Snow Tire Definition: Michelin agrees that ASTM F1805-20 should be used for the Snow Tire definition with a traction index equal to or greater than 112 when using the Specification ASTM F2493 (16-inch SRTT) and when tested on “medium pack snow” surface.
- UTQGS: Michelin agrees on using all 17 quarters of data available to calculate the wear conversion factor and supports the NHTSA proposed conversion factor of 1.324. Michelin also agrees with changing the language to refer to circuits completed rather than the estimated 400 miles per circuit. Michelin opposes lengthening the amount of time tires may be removed from storage to four months as this could impact the BCWR results. Finally, Michelin recommends defining “storage” per the guidelines set forth in ASTM F2493 (16-inch SRTT).
- ASTM F2493 (16-inch SRTT) revision date: Michelin recommends that all NHTSA’s Federal Motor Vehicle Safety Standards and Consumer Information Regulations refer to ASTM F2493 (16-inch SRTT) without a revision date.
- Benefits and Cost: This rulemaking will allow NHTSA, testing facilities, car manufacturers and tire manufacturers to continue to operate by being able to verify test surface friction coefficients prior to compliance testing, to rate new tires for their treadwear under the UTQGS and to rate new tires based on the snow definition. Any potential cost increase is inconsequential compared to the potential inability to continue to perform these operations due to the ASTM E1136 (14-inch SRTT) unavailability.
- Lead time: Due to the imminent unavailability (in terms of stock quantity or age limit) of the ASTM E1136 (14-inch SRTT), Michelin recommends NHTSA publish a final rule as soon as possible, more specifically for UTQGS so that NHTSA can continue to determine the BCWR without interruption. Michelin also agrees with making the changes to the UTQGS effective at the next BCWR determination 30 days after the publication of the final rule. Finally, Michelin recommends shortening the lead time for FMVSS changes to substantially less than the typical 180 days to one year after publication.

## **I. Introduction**

Michelin, the leading mobility company, is dedicated to enhancing its customers' mobility and sustainably; designing and distributing the most innovative tires, services and solutions for its customers' needs; providing digital services, maps, and guides to help enrich trips and travels and make them unique experiences; and developing high-technology materials that serve a variety of industries. Headquartered in Greenville, South Carolina, Michelin North America has approximately 23,000 employees and operates 34 production facilities in the United States and Canada.

As a registered motor vehicle equipment manufacturer, Michelin commends NHTSA for seeking public comments on modifications to existing Federal Motor Vehicle Safety Standards and Consumer Information Regulations, including Surface Friction Measurement, Snow Tire Definition and UTQGS.

## **II. Michelin Responses to Requests for Comment**

### **A. Availability of Standard Reference Test Tires (SRTT)**

In August 2014, Michelin decided to plan the transition away from the ASTM E1136 (14-inch SRTT) produced since 1986 for the following reasons:

- Usage as reference becoming less representative as market sizes evolve; and
- Production more difficult to maintain due to materials and processes becoming obsolete.

Late 2014, Michelin (sole producer of this tire) started planning for the discontinuation with ASTM International. In May 2015, Michelin notified industry groups, governments, regulators, and standards organizations of this approaching obsolescence and that the supply was uncertain beyond the end of 2017 due to material availability. In June 2017, Michelin communicated an updated target of late 2019 to end production of this tire.

Michelin now confirms that production of the ASTM E1136 (14-inch SRTT) ceased in the fall of 2020 and the stock in Michelin's hands has been depleted as of July 2021.

Beginning in 2009, Michelin also began producing and selling the ASTM F2493 (16-inch SRTT) which is a reference tire more representative of tires on the road today and a suitable replacement for the ASTM E1136 (14-inch SRTT).

The ASTM F2493 (16-inch SRTT) has been or is in the process of being introduced into most Standards <sup>1</sup> and Regulations <sup>2</sup> which refer to the ASTM E1136 (14-inch SRTT).

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<sup>1</sup> See Appendix A, page 10

<sup>2</sup> See Appendix B, page 11

Michelin also confirms that the production of ASTM F2493 (16-inch SRTT) is ongoing with regularly scheduled builds, and an appropriate stock continues to be maintained with a minimum level that ensures that both NHTSA and other organizations who require the ASTM F2493 (16-inch SRTT) for testing can procure tires as needed.

## **B. ASTM F2493 (16-inch SRTT) revision date**

Michelin concurs with and joins the comments of the USTMA regarding the use of the ASTM F2493 (16-inch SRTT) revision date. Michelin recommends that all NHTSA's Federal Motor Vehicle Safety Standards and Consumer Information Regulations refer to ASTM F2493 (16-inch SRTT) without a revision date.

When issuing a new revision, ASTM International ensures that the tire performance remains the same. For example, the purpose of the 2020 revision of ASTM F2493<sup>3</sup> was to align the target value of one the tread compound physical properties with actual measured values based on multiple consecutive years of production data. The specification change between the 2019 and the 2020 revisions had no impact on tire performance. All SRTT builds undergo a performance validation to determine the acceptability prior to release. This performance validation does not change with a revision to the SRTT specification. And all SRTT builds are only released based on successful performance screening tests.

For this reason, test methods ASTM E1337-19, and ASTM F1805-20, which are being used in this NPRM, do not refer to a specific revision of ASTM F2493 (16-inch SRTT). On the contrary, it is mandatory to refer to the revision for the test methods, such as ASTM E1337-19 and ASTM F1805-20, because these revisions were created to introduce the use of a completely different reference tire (ASTM F2493 (16-inch SRTT) vs. ASTM E1136 (14-inch SRTT) previously).

In addition, as noted in the USTMA's comments filed in response to this NPRM, other standards and regulatory bodies are referencing various SRTT specifications without a revision date.

## **C. Surface Friction Measurement**

Michelin concurs with and joins the comments of the USTMA regarding the surface friction measurement.

As the ASTM E1136 (14-inch SRTT) was targeted to be phased-out, ASTM International decided to use the ASTM F2493 (16-inch SRTT) in its place for the reference tire in ASTM E1337 (Standard Test Method for Determining Longitudinal Peak Braking Coefficient of Paved Surfaces Using Standard Reference Test Tire).

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<sup>3</sup> ASTM International. F2493-20 Standard Specification for P225/60R16 97S Radial Standard Reference Test Tire. West Conshohocken, PA; ASTM International, 2020. doi: <https://doi.org/10.1520/F2493-20>

The purpose of the 2019 revision of ASTM E1337 was to establish correlation equations to allow specifications originally established for the 14-inch tire to be converted for use with the 16-inch tire. Likewise, data collected with the 16-inch tire can be converted to compare with historical 14-inch data.

Michelin agrees that ASTM E1337-19<sup>4</sup> should be used for surface friction measurement, including its correlation equations between the ASTM E1136 (14-inch SRTT) and the ASTM F2493 (16-inch SRTT) which were validated by the study commissioned by NHTSA and performed by Transportation Research Center Inc. Michelin also agrees with the Peak Friction Coefficient (PFC) values derived from the equation in ASTM E1337-19 as shown in the table of the section A.1. of the NPRM (page 42765).

Finally, Michelin urges NHTSA to refer to ASTM F2493 (16-inch SRTT) without a revision date since it has no impact on the ASTM E1337-19 test results as explained in section II.B. above. This would impact the proposed amendments of §571.5, §571.105, §571.121, §571.122, §571.126, §571.135, §571.136, §571.500.

#### **D. Snow Tire Definition**

Michelin concurs with and joins the comments of the USTMA regarding the snow tire definition.

As the ASTM E1136 (14-inch SRTT) was targeted to be phased-out, ASTM International decided to use the ASTM F2493 (16-inch SRTT) in its place for the reference tire in ASTM F1805 (Standard Test Method for Single Wheel Driving Traction in a Straight Line on Snow and Ice-Covered Surfaces). An ASTM F09.20 Task Force was formed to validate the use of the ASTM F2493 (16-inch SRTT) as both a surface monitoring tire and a control tire for ASTM F1805. The ASTM F09.20 Task Force also conducted extensive testing to establish a correlation factor between the ASTM E1136 (14-inch SRTT) and ASTM F2493 (16-inch SRTT) specifically for the medium packed snow surface. The results of this multi-year effort have been documented in a Technical Report published April 10, 2019, titled “Report on E1136 to F2493 SRTT Transition for ASTM F1805”<sup>5</sup>. The key determination of the ASTM Task Force, as documented in the Technical Report is the constant ratio correlation factor between ASTM E1136 (14-inch SRTT) and ASTM F2493 (16-inch SRTT) for medium packed snow:

$$\text{Equivalent E1136 14-inch SRTT rating} = \text{F2493 16-inch SRTT Rating} \times 0.987$$

The purpose of the 2020 revision of ASTM F1805 was to add ASTM F2493 (16-inch SRTT) as an acceptable replacement for the ASTM E1136 (14-inch SRTT).

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<sup>4</sup> ASTM International. E1337-19 Standard Test Method for Determining Longitudinal Peak Braking Coefficient (PBC) of Paved Surfaces Using Standard Reference Test Tire. West Conshohocken, PA; ASTM International, 2019. doi: <https://doi.org/10.1520/E1337-19>

<sup>5</sup> [https://www.astm.org/COMMIT/2019\\_04\\_10\\_E1136%20to%20F2493%20transition%20for%20ASTMF1805.pdf](https://www.astm.org/COMMIT/2019_04_10_E1136%20to%20F2493%20transition%20for%20ASTMF1805.pdf)

Michelin agrees that ASTM F1805-20<sup>6</sup> should be used for snow tire definition.

Michelin further agrees with the definition of a “snow tire” in FMVSS No.139 as a tire that attains a traction index equal to or greater than 112 when tested using the ASTM F1805-20 test method and using the ASTM F2493 (16-inch SRTT), which is consistent with the guidance from the USTMA as issued in TISB 37<sup>7</sup>.

Michelin also agrees with NHTSA’s assumption that the surface condition intended for use by tire manufacturers for the marketing of snow tires is the “medium pack snow” surface.

Finally, Michelin urges NHTSA to refer to ASTM F2493 (16-inch SRTT) without a revision date since it has no impact on the ASTM F1805-20 test results as explained in section II.B. above. This would impact the proposed amendment of §571.139.

## **E. UTQGS**

Michelin concurs with and joins the comments of the USTMA regarding the UTQGS.

As was discussed in 2017 between NHTSA and Michelin, and as documented in the “2017-01 Michelin Input for SRTT Change Final” presentation<sup>8</sup>, Michelin is still recommending adding a conversion factor to the existing formula derived from the ratio of the BCWR from the 14-inch SRTT CMT to the BCWR of the 16-inch SRTT CMT measured over a specific number of quarters.

Michelin would like to confirm the explanation of the calculation of the conversion factor as presented in the NPRM:

- NHTSA first states, on page 42766, that it has 14 consecutive quarters of data then NHTSA mentions later, on page 42767, that the basis of the adjustment is on the average of 17 quarters. Also, on page 42766 and 42767, the Table 1 shows data for 17 quarters. Michelin believes that the correct number of consecutive quarters should be 17.
- On page 42767, in the calculation of the adjustment used for the NPRM, NHTSA states that the average BCWR wear rate using the 14-inch SRTT is 7.911 and the one for the 16-inch SRTT is 5.942. Then NHTSA calculates the conversion factor by dividing 7.911 by 5.977. There is an inconsistency between 5.942 (which appears to be the average of the first 14 quarters of data) and 5.977 (which is the average for all 17 quarters of data). Michelin believes that the correct value is 5.977, encompassing the 17 quarters of data, which results in a conversion factor of 1.324 as stated in the NPRM.

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<sup>6</sup> ASTM International. F1805-20 Standard Test Method for Single Wheel Driving Traction in a Straight Line on Snow- and Ice-Covered Surfaces. West Conshohocken, PA; ASTM International, 2020. doi: <https://doi.org/10.1520/F1805-20>

<sup>7</sup> <https://www.ustires.org/tisb-37-ustma-definition-passenger-and-light-truck-tires-use-severe-snow-conditions>

<sup>8</sup> <https://www.regulations.gov/document/NHTSA-2020-0067-0002>

At the time of the 2017 meeting between NHTSA and Michelin, it was thought that the measurements would be done over 6 quarters only, which Michelin indicated to be the minimum. A minimum of 4 quarters would have been needed to assess the difference in all seasons, and to create an adjustment factor (if that solution was chosen). Repeating two seasons would have allowed for confirmation of the difference in a warmer-weather and a colder-weather test.

Since NHTSA has in fact accumulated the data over 17 consecutive quarters, Michelin now recommends using all quarters available to determine the conversion factor. Upon inspection of the available 17 quarters of data, no time-dependent trend is apparent which is more significant than the observed test variability. Because of the absence of an apparent time-related trend, using all available test data in the calculation of a ratio of means between the 14-inch BCWR and 16-inch BCWR should result in the most appropriate estimation for the true difference in wear rates between the two populations of reference tires.

Michelin also agrees on defining the conversion factor as the average BCWR wear rate using the 14-inch SRTT divided by the average BCWR wear rate using the 16-inch SRTT, which equates to:

$$\text{Conversion factor} = 7.911 / 5.977 = 1.324$$

Michelin agrees with referencing the total distance and schedule of events in terms of circuits completed rather than the estimated 400 miles per circuit and does not believe that this would negatively impact the testing process or the data integrity.

Michelin opposes lengthening the amount of time tires may be removed from storage to four months. Environmental exposure does affect tire properties and could impact the results of the published BCRW compared to what has been done in the past. Based on the discussions in the Final Rule for 49 CFR Part 575 published 05/24/2000 [Docket No. 00-7364]<sup>9</sup>, NHTSA decided to limit the time tires may be removed from storage to two months. This decision was made for the ASTM E1136 (14-inch SRTT), but similar environmental exposure effects would probably be encountered with the ASTM F2493 (16-inch SRTT). By increasing the allowed time from two to four months, the effect of tire exposure to an uncontrolled environment would be more severe and cause more uncertainty in the test results.

In addition, the supply of the ASTM F2493 (16-inch SRTT) is actively managed, and NHTSA should have no issue procuring tires in a timely fashion for the BCWR determination. This also eliminates the need for lengthening the amount of time tires may be removed from storage to four months.

Michelin recommends defining “storage” per the guidelines set forth in ASTM F2493. Per that standard, “The tires shall be stored under constant relative humidity conditions at a temperature not to exceed 70°F (21°C) and above freezing. The ozone level in the storage area shall not exceed 5 parts/10<sup>8</sup> (or 5 MPa partial pressure), and no tires shall be stored within 30 ft

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<sup>9</sup> <https://www.federalregister.gov/documents/2000/05/24/00-12873/consumer-information-regulations-uniform-tire-quality-grading-test-procedures#footnote-3-p33484>

(9.1 m) of electrical motors or other ozone-generating equipment. Storage of the tires shall be in subdued light, with the tires stacked unbundled, no more than eight tires high on a pallet”.

Finally, Michelin urges NHTSA to refer to ASTM F2493 (16-inch SRTT) without a revision date since it has no impact on the wear test results as explained in section II.B. above. This would impact the proposed amendment of §575.3.

#### **F. Benefits and Cost**

The most critical benefit of this rulemaking will be to allow all entities involved (including NHTSA, testing facilities, car manufacturers and tire manufacturers) to continue to operate by being able to verify the test surface friction coefficients prior to compliance testing, to rate new tires for their treadwear under the UTQGS and to rate new tires based on the snow definition. Without the proposed rule, it will be very soon impossible to perform any of these tasks as the various entities will run out of existing ASTM E1136 (14-inch SRTT), or the remaining ASTM E1136 (14-inch SRTT) will be over the age limit defined in the standards or regulations. For example, §575.104 states that “the CMT must be no more than one year old at the commencement of testing”. Since the last ASTM E1136 (14-inch SRTT) production occurred in the fall of 2020, NHTSA will be unable to continue to perform the BCWR testing beyond fall of 2021.

The potential marginal increase in cost due to the difference in price between the ASTM E1136 (14-inch SRTT) and the ASTM F2493 (16-inch SRTT) is inconsequential compared to the potential inability for all entities to continue to operate.

#### **G. Timing**

Michelin concurs with and joins the comments of the USTMA regarding the need to expedite the publication of the final rule.

As stated above, the ASTM E1136 (14-inch SRTT) is no longer available for purchase from Michelin after the production ended in 2020. Consequently, test locations will soon run out of tires or their remaining stock will reach the age limit defined in the standards or regulations. With §575.104 specifying an age limit of one year for the Course Monitoring Tire, UTQGS is likely to be the first impacted by a lack of availability of qualified ASTM E1136 (14-inch SRTT).

Due to this imminent unavailability of the ASTM E1136 (14-inch SRTT), Michelin respectfully requests that NHTSA publish a final rule as soon as possible.

Michelin also agrees with NHTSA’s NPRM proposal to make the changes to the UTQGS effective at the next BCWR determination 30 days after the publication of the final rule.

As far as the changes to FMVSS, Michelin also recommends shortening the lead time to substantially less than the typical 180 days to one year after publication of the final rule.

### III. Conclusion

Michelin appreciates the opportunity to submit these comments and supports the comments filed by the USTMA regarding the proposed amendments to several Federal Motor Vehicle Safety Standards and Consumer Information Regulations to update the Standard Reference Test Tire (SRTT) used therein. Michelin will also continue to ensure the availability of the ASTM F2493 (16-inch SRTT) chosen by NHTSA for this update.

Sincerely,



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## Appendix A: Standards referencing ASTM F2493 (16-inch) SRTT

| Org.  | Standard / Reg. | Committee  | Description  | Makes reference to:   |                                     | Transition method & Timing   |
|-------|-----------------|------------|--|-----------------------|-------------------------------------|--|
|       |                 |            |  | ASTM E1136 P195/75R14 | ASTM F2493 P225/60R16               |  |
| ASTM  | E1337           | E17.21     | Standard Test Method for Determining Longitudinal Peak Braking Coefficient of Paved Surfaces Using Standard Reference Test Tire                  | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | E1859 / E1859M  | E17.21     | Standard Test Method for Friction Coefficient Measurements Between Tire and Pavement Using a Variable Slip Technique                             | yes                   | yes when published                  | Future update planned  |
| ASTM  | E274 / E274M    | E17.21     | Standard Test Method for Skid Resistance of Paved Surfaces Using a Full-Scale Tire   | yes                   | yes when published                  | Future update planned  |
| ASTM  | E1082           | E17.31     | Standard Test Method for Measurement of Vehicular Response to Traveled Surface Roughness   | yes                   | yes when published                  | Future update planned  |
| ASTM  | E1215           | E17.31     | Standard Specification for Trailers Used for Measuring Vehicular Response to Road Roughness  | yes                   | yes when published                  | Future update planned  |
| ASTM  | F1649           | F09.20     | Standard Test Methods for Evaluating Wet Braking Traction Performance of Passenger Car Tires on Vehicles Equipped with Anti-Lock Braking Systems | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | F1650           | F09.20     | Standard Practice for Evaluating Tire Traction Performance Data Under Varying Test Conditions  | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | F1805           | F09.20     | Standard Test Method for Single Wheel Driving Traction in a Straight Line on Snow- and Ice-Covered Surfaces                                      | yes                   | yes                                 | F2493 acceptable replacement for E1136 from 2020   |
| ASTM  | F2493           | F09.20     | Standard Specification for P225/60R16 97S Radial Standard Reference Test Tire  | yes                   | yes                                 | n/a  |
| ASTM  | F2870           | F09.20     | Standard Specification for 315/70R22.5 154/150L Radial Truck Standard Reference Test Tire  | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | F2871           | F09.20     | Standard Specification for 245/70R19.5 136/134M Radial Truck Standard Reference Test Tire  | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | F2872           | F09.20     | Standard Specification for 225/75R16C 116/114S M+S Radial Light Truck Standard Reference Test Tire   | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | F1572           | F09.20     | Standard Test Methods for Tire Performance Testing on Snow and Ice Surfaces  | yes                   | yes when published                  | Under revision, will include F2493 as one of the reference tires                                     |
| ASTM  | F538            | F09.94     | Standard Terminology Relating to Characteristics and Performance of Tires <sup>1</sup>   | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ASTM  | F1806           | F09.94     | Standard Practice for Tire Testing Operations—Basic Concepts and Terminology for Reference Tire Use  | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |
| ISO   | ISO 19447       | TC 31      | Ice Grip Test Method   | no                    | yes                                 | F2493 only reference tire  |
| ISO   | ISO 23671       | TC 31      | Wet Grip Test Method   | yes                   | yes                                 | The method of track validation revised to be done only with 16" SRTT instead of with BPN or 14" SRTT |
| ISO   | ISO 15222       | TC 31      | Truck and bus tyres — Method for measuring relative wet grip performance — Loaded new tyres  | yes                   | yes when published in July/Aug 2021 | Change of SRTT for tracks validation (from SRTT 14" to SRTT 16" due to SRTT 14" discontinuation)     |
| ISO   | ISO 11819       | TC 43 /SC1 | Measurement of influence of road surface on traffic noise  | yes                   | yes                                 | January 2021 revision refers to F2493  |
| USTMA | TISB37          |            | Definition of 3PMSF  | yes                   | yes                                 | Specification E1136, F2493 are both acceptable   |

## Appendix B: Regulations referencing ASTM F2493 (16-inch) SRTT

| Org.             | Standard / Reg.                                      | Description                           | Makes reference to:    |                        | Transition method & Timing  | Comment  |
|------------------|--|---------------------------------------|------------------------|------------------------|---|--|
|                  |  |                                       | ASTM E1136 P195/75R1 4 | ASTM F2493 P225/60R1 6 |   |  |
| Canada           | CMVSS 136  | Motor Vehicle Tire Safety Regulations | yes                    | yes                    | Meets one of the following snow traction requirements: ASTM F1805 - 06 with E1136 reference or ASTM F1805 - 20 with F2493 reference | The section needed to be amended to allow for another, newer standard reference test tire (SRTT16) that is already familiar to industry, and allow for the legacy SRTT14 until the depletion of stock. |
| Canada           | TS 105 / 121 / 122 / 126 / 135 / 139 / 500           | Motor Vehicle Tire Safety Regulations | yes                    | yes when published     |   | Transport Canada is also assessing 7 Technical Standards Documents which also refer to the 14" SRTT and will be amending these standards documents accordingly, in alignment with NHTSA where possible |
| UN/ECE           | R117   |                                       | yes                    | yes when published     | Introduces the 16" SRTT   | Supplement 13 to the 02 series of amendments to UN Regulation No. 117  |
| Brazil           | 544/2012   | PROTARIA INMETRO                      | yes                    | yes when published     | ISO 23671: revised<br>ISO 15222: Expected publication for ISO revisions between July / August 2021                                  | Refers to ISO 23671 and ISO 15222  |
| India / Mid East | AIS142<br>GSO ECE R117<br>SASO ECE R117<br>SASO 2857 |                                       | yes                    | yes when published     |   | India and Middle East regulations depend on R117. It is anticipated that these regs will automatically adopt the changes from R117 when it is revised.   |