



September 7, 2021

Dr. Steven Cliff
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

**RE: Notice of Proposed Rulemaking (NPRM); Standard Reference Test Tire;
Docket No. NHTSA-2020-0067; 86 FR 42762; August 05, 2021**

Dear Acting Administrator Cliff:

The Alliance for Automotive Innovation appreciates the opportunity to provide comments in response to NHTSA's August 5, 2021, Notice of Proposed Rulemaking ("NPRM") to amend several Federal Motor Vehicle Safety Standards ("FMVSS") and consumer information regulations to update the standard reference test tire ("SRTT").¹

In general, Auto Innovators is supportive of NHTSA's ongoing efforts to modernize regulations to reflect changes in technology, and we agree with the agency's decision to update each of the relevant safety standards and regulations to no longer reference the 14-inch SRTT. However, we request that additional lead time be provided beyond the six months proposed for implementing changes to FMVSS.

More specifically, Auto Innovators request that NHTSA provide one year lead time for implementing changes to FMVSS, but also permit optional early compliance where manufacturers opt to certify using the 16-inch tire prior to the required compliance date and phase-in. This is to ensure manufacturers have sufficient time to transition to the new tire specifications, and minimize unnecessary burden and disposal of any 14-inch tires that have already been purchased for the purposes of evaluating performance. As indicated in the NPRM, the current peak braking coefficient specifications using the 14-inch SRTT are equivalent to the proposed peak braking coefficients using the 16-inch SRTT, and therefore should result in no difference in test performance. This is also consistent with the requirement that regulatory testing be conducted "using SRTTs that were manufactured within one year prior to the commencement of testing and two months after removal from storage in order to prevent variability in results due to tire aging." NHTSA would not be limited from stockpiling the necessary tires to conduct verification testing during the one-year transition should this additional lead time be provided.

¹ The Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. Its members are listed as follows: Aisin Group, APTIV, Argo AI, BMW Group, Bosch, Byton, Cruise, Denso, Ferrari, Ford, GM, HARMAN, Honda, Hyundai, Infineon, Intel, Isuzu, Jaguar Land Rover, Karma, Kia, Local Motors, Luminar, Mazda, Mercedes-Benz, Mitsubishi Motors, Nissan, NXP, Panasonic, Porsche, RV Industry Association, Sirius XM, Stellantis, Subaru, Suzuki, Texas Instruments, Toyota, Volkswagen Group of America and Volvo.



In addition, due to the equivalency in the braking coefficient specifications between the 14-inch and 16-inch tire, we also request that NHTSA not require additional certification testing for carryover vehicle models that may have been certified using the 14-inch SRTT. This is also consistent with the agency's proposal that "tire lines rated prior to the effective date of the changes proposed in this rule would not be required to be rerated."

In conclusion, providing clear communication regarding when the final rule is expected to be published relative to the discontinuation of the 14-inch tire will help ensure manufacturers have adequate time to modify their testing schedules accordingly.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Schmidt". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Scott Schmidt
Vice President, Safety Policy