November 2, 2021

SUBMITTED VIA REGULATIONS.GOV TO DOCKET# NHTSA-2021-0053

Steven S. Cliff
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Notice of Proposed Rulemaking: Corporate Average Fuel Economy Standards for Model Year 2024 – 2026 Passenger Cars and Light Trucks, 86 FR 49602, RIN 2127-AM34 (September 3, 2021).

Dear Dr. Cliff:

On behalf of the U.S. Tire Manufacturers Association (USTMA), I am pleased to submit this letter commenting on the above-captioned rulemaking. As the national trade association for tire manufacturers that produce tires in the U.S., USTMA has a direct interest in this rulemaking. USTMA members operate manufacturing facilities in 17 states, employ nearly 100,000 workers and generate annual sales of more than $27 billion. Our member companies include Bridgestone Americas, Inc.; Continental Tire the Americas, LLC; Giti Tire (USA) Ltd.; The Goodyear Tire & Rubber Company; Hankook Tire America Corp.; Kumho Tire U.S.A., Inc.; Michelin North America, Inc.; Nokian Tyres Inc.; Pirelli Tire LLC; Sumitomo Rubber Industries; Toyo Tire Holdings of Americas Inc. and Yokohama Tire Corporation.

USTMA supports the goals and approach of the NPRM to revise fuel economy standards for passenger cars and light trucks for model years 2024 – 2026. USTMA member companies are committed to sustainable manufacturing practices in every aspect of their businesses. As global leaders in manufacturing, our members embrace a shared responsibility of helping to achieve a more sustainable society. We recognize three essential pillars of sustainability: safety, environment and economic impact. We have established six sustainability visions to illustrate our commitments.[1] One of our visions relates directly to this NPRM. In particular, our members strive to reduce greenhouse gas emissions throughout a tire's life cycle, which includes producing tires that reduce vehicle CO2 emissions.

[1] For more information about USTMA's Sustainability Vision, visit https://sustainability.ustires.org/.

Below, USTMA provides specific comments on several tire-specific points and welcomes the opportunity for dialogue with NHTSA regarding tire rolling resistance as the agency works to finalize the rule.

1. Relationship between tire rolling resistance and wet grip performance

In the NPRM, NHTSA explained that the agency conducted "tire rolling resistance tests and wet grip index tests on original equipment tires installed on new vehicles."[2] In these tests, NHTSA did not observe any unacceptable trade off between rolling resistance and wet grip performance, which NHTSA correctly recognized is due to advanced tire design, rubber compounding and manufacturing technologies. Tire manufacturers have indeed developed countermeasures to address the inherent inverse relationship between rolling resistance and wet grip performance. USTMA cautions, however, this inverse relationship between rolling resistance and wet grip performance still exists, and as the tire industry continues to enhance rolling resistance performance, new and/or enhanced countermeasures will also need to be developed to assure no unacceptable impact to wet grip performance.

2. Feasibility of reaching ROLL30

USTMA agrees with NHTSA's approach to consider two levels of rolling resistance improvements in its CAFE model – 10 percent (ROLL10) and 20 percent (ROLL20) from the baseline RRC value of 0.009 (based on a CONTROLTEC study prepared for the California Air Resources Board). NHTSA noted that while the tire industry continues to improve rolling resistance performance, that a 30 percent improvement in rolling resistance "will not be available for widespread commercial adoption in the fleet during the rulemaking timeframe." USTMA agrees with this assessment, and its members will continue to develop advanced rolling resistance technologies for future adoption, since vehicle manufacturers continue to prioritize rolling resistance as one of the more cost-effective ways to achieve advancements in vehicle fuel economy.

Regarding consumers' willingness to accept these tires on their vehicles, NHTSA's studies have shown that consumers prioritize price, tire traction, and tire mileage over tire rolling resistance. This is evident in the tire replacement market, which, as stated in the CONTROLTEC study, has higher rolling resistance levels than the OE tire market. So, the average consumer may be willing to accept lower rolling resistance tires, but generally not at the expense of price, traction, or tire mileage. For these reasons, it

[2] 86 FR 49602 at 49701.

is not inherently simple to improve tire rolling resistance but requires R&D to continue advancing the tire technology levels.

3. Tire rolling resistance analysis fleet assignments

In the NPRM, NHTSA recognizes the complex nature of the original equipment (OE) fleet and describes its process for assigning rolling resistance values to the analysis fleet. The agency provides the breakdown of MY 2020 rolling resistance technology as follows: "44% at ROLL0, 20% at ROLL10, and 36% at ROLL20," where ROLL0 represents current technology, ROLL10 represents a 10% improvement from the baseline and ROLL20 represents at 20% from the baseline. In the NPRM, NHTSA invited comment on whether these values are still applicable or whether updated rolling resistance values should be included. USTMA does not have recent analysis of OE tire fitments that could be adapted for this purpose. However, USTMA welcomes the opportunity for dialogue with NHTSA on this topic and will evaluate potential available data for possible application here.

Again, we appreciate opportunity to provide these comments. Should you have any questions or require further information, please contact me at 202-682-4839 or tnorberg@ustires.org.

Sincerely,

Tracey Norberg
Senior Vice President & General Counsel
U.S. Tire Manufacturers Association