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# US Tire Industry Perspective on AB 844 Implementation

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# RMA Tire Company Members





## RMA Perspective Summary

- Supports moving forward with AB 844 rating system and consumer information program
- CEC testing data provides good foundation to characterize the market
- RMA has collected supplemental data to augment CEC data
- RMA has begun analysis to characterize market using all available data (CEC + RMA)
- RMA supports use of SAE J1269 single point test



## AB 844 Components

- Consumer Information and Related Requirements
- Performance Standards and Related Requirements
- Our understanding is that focus today is on consumer information only



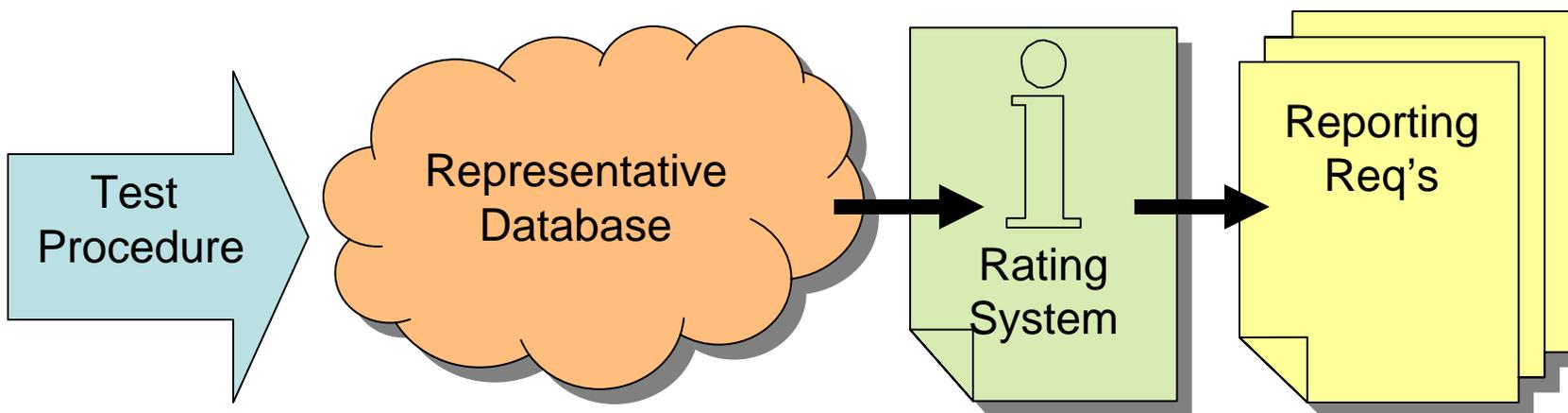
# AB 844 Consumer Information Section Requirements

Develop and adopt:

- *A database of a representative sample of tires sold in the state based on test procedures adopted by the commission*
- *Based on database, develop rating system for energy efficiency of tires sold in state*
- *Based on test procedures and rating system, requirements for tire manufacturers to report energy efficiency of tires sold in state*



# AB 844 Process Shorthand





## Step 1: Select a Test Procedure

- RMA recommends SAE J 1269 single point test as appropriate reference test procedure for AB 844 work
- CEC conducted correlation work comparing SAE J1269 single point test to SAE J2452 test
  - CEC found that tests were highly correlated
  - SAE J 1269 single-point test is most efficient and cost-effective test existing today



# Global Test Procedure Development

- Global tire industry developing global single point test procedure through ISO process
- ISO test is designed for regulatory development and compliance purposes with earliest adoption in 2009
- Industry would support migration to ISO global single point test method for use in CA when ISO test method is adopted
- This should not negatively impact the CEC AB 844 process but would harmonize industry testing and data collection globally
- RMA will keep CEC apprised of ISO developments



## Step 2: Establish a Database of a Representative Sample of Tires

- Available Data Sources on US Tires
  - CEC database currently includes CEC/Smithers test data
  - Other data
    - Ecos/Greenseal Data
    - NRC Report Data
- RMA intends to supplement current data with additional data on 600+ tires



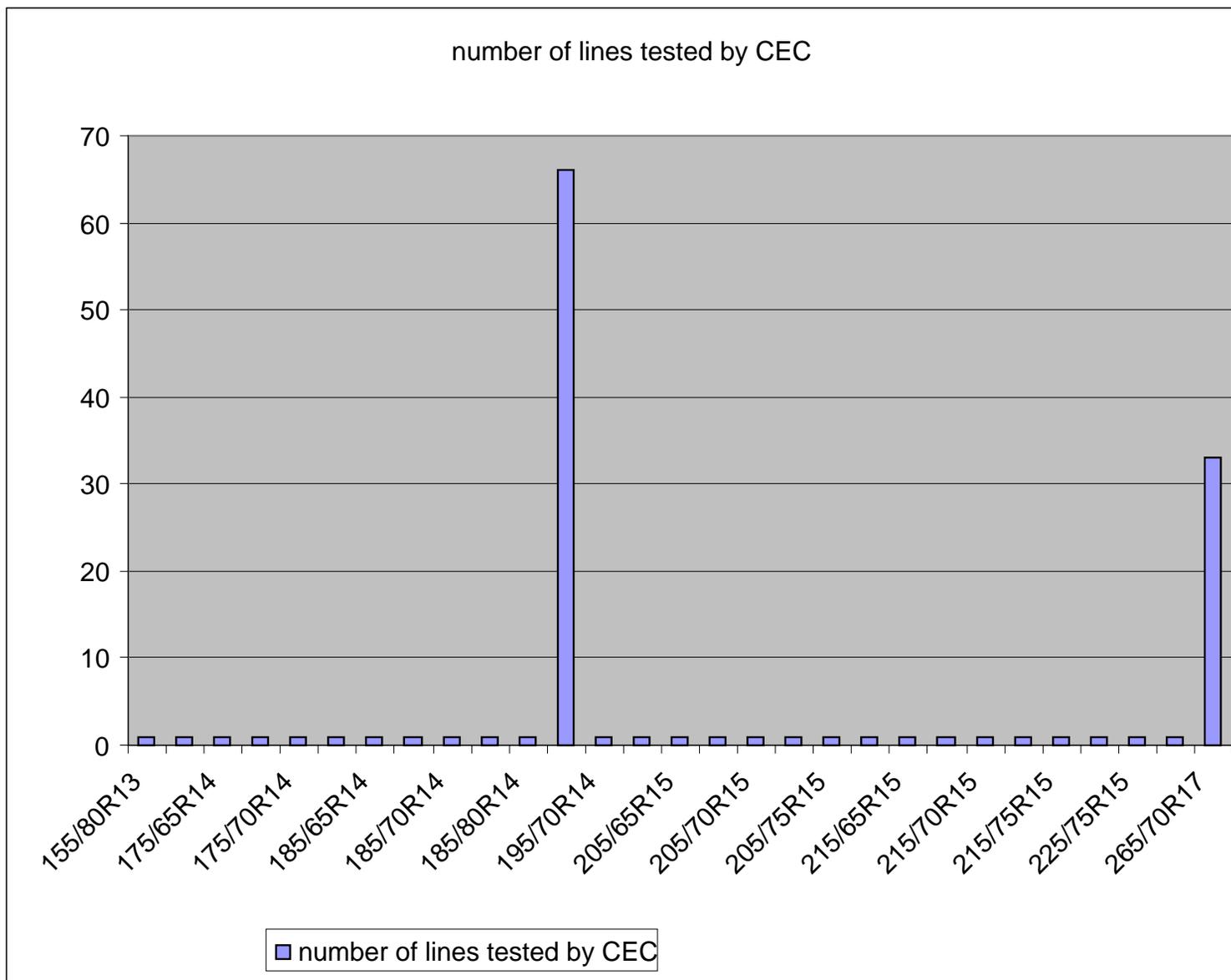
## CEC Study Data

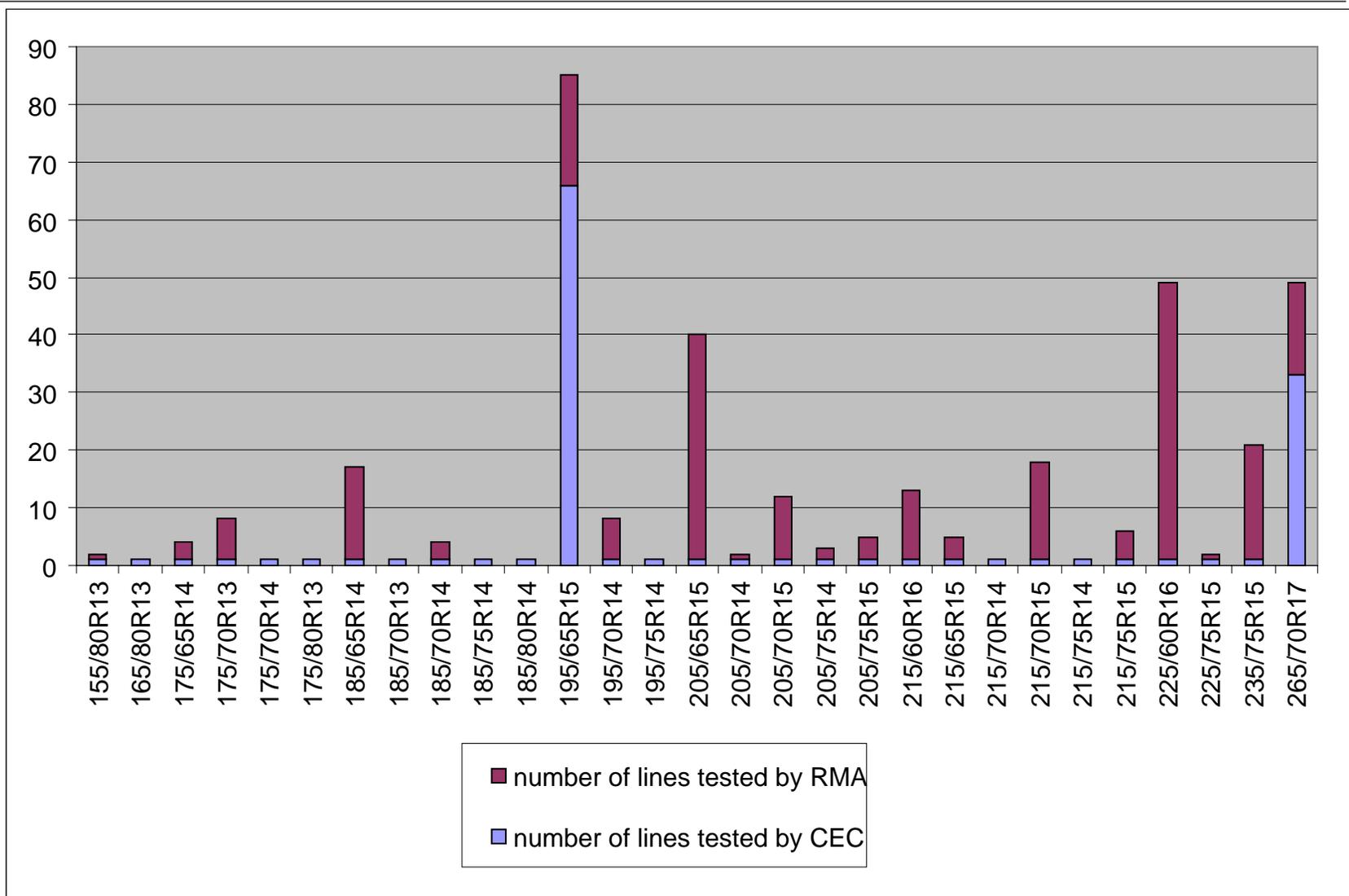
- CEC conducted a \$400,000 study to assess rolling resistance of tires in CA
- Tested two tire sizes selected by evaluation of most popular vehicles in CA (2004 data)
  - P195/65R15 (e.g., Honda Accord, Toyota Corolla, Dodge Status, Nissan Altima, Pontiac Sunfire, Saturn L Series)
  - P265/70R17 (e.g., Ford F150, Chevy Silverado, Chevy Avalanche, Cadillac Escalade, Dodge Ram Pickup 1500 Series, Ford Expedition, GMC Sierra Pickup, GMC Yukon)
- One complete tire line of 28 tire sizes also tested (Firestone FR 380)
- Total of 149 tire models tested (5 replicates each)



## CEC Study Data

- CEC study designed to form basis for establishing a database of a representative sample of tires
  - Tested tires in a broad range of brands, speed ratings and service types in two popular tire sizes on both ends of the tire size spectrum
  - Explored size effects on rolling resistance by evaluating one complete tire line
- These data can be supplemented to establish a database of representative sample of tires







## Other Data Sources

- Ecos/Greenseal
  - Limited utility due to incomplete information about the tires tested
- NRC Report Database
  - Data on 162 tires
- RMA Data
  - Data on 627 tires
  - RMA data includes NRC tires

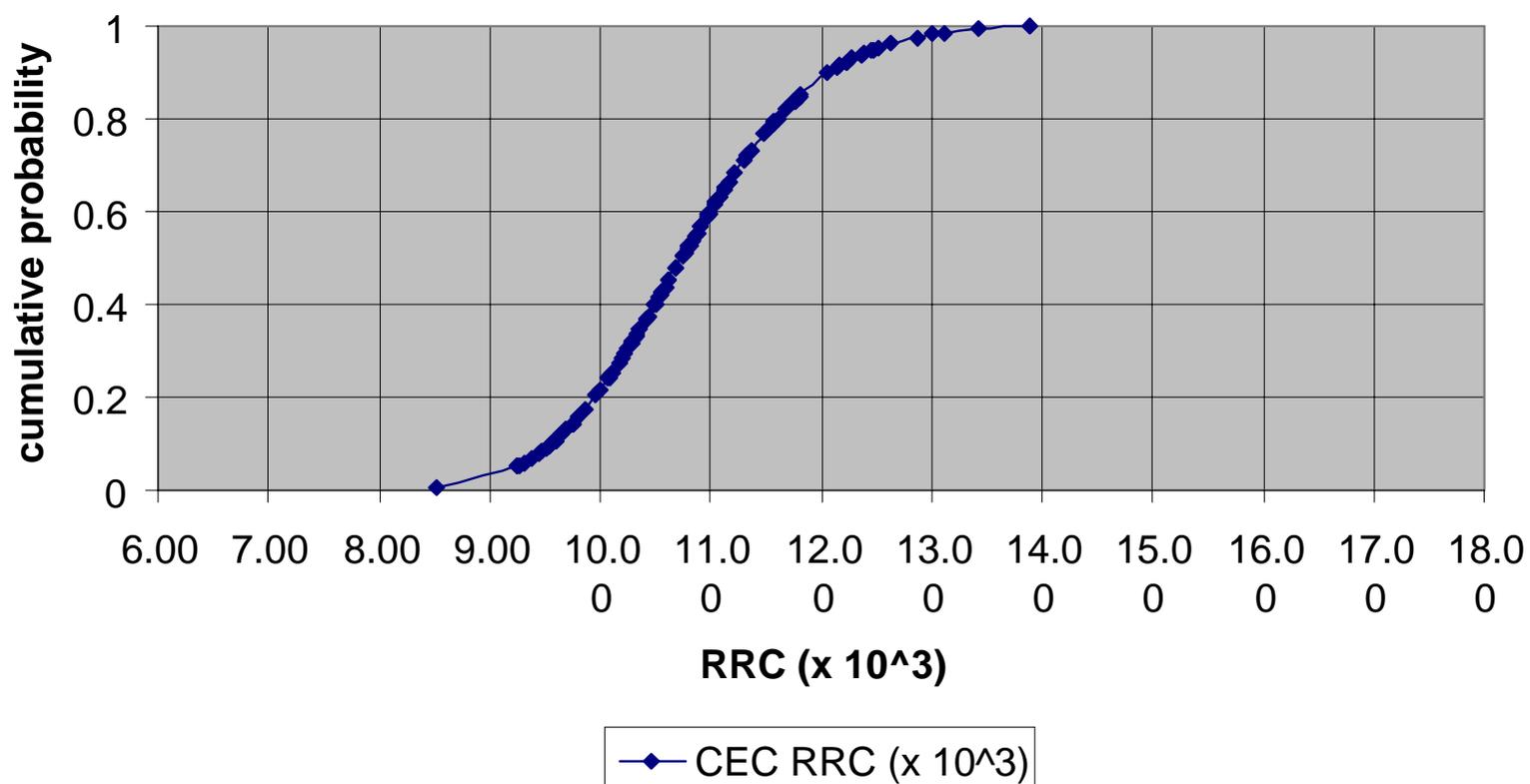


## Step 3: Create a Rating System

- Use representative database (CEC + RMA) to characterize marketplace
  - Use tested rolling resistance coefficient (RRc) data
  - Use other descriptive data about tested tires (UTQG ratings , speed rating, service type, etc.)
  - Use industry data on size popularity and tire shipments
  - Use CA vehicle registration data to determine popular vehicles
  - Use statistical modeling to characterize the tire market in terms of rolling resistance
- Segment marketplace into performance categories for rating tire fuel efficiency (rolling resistance)

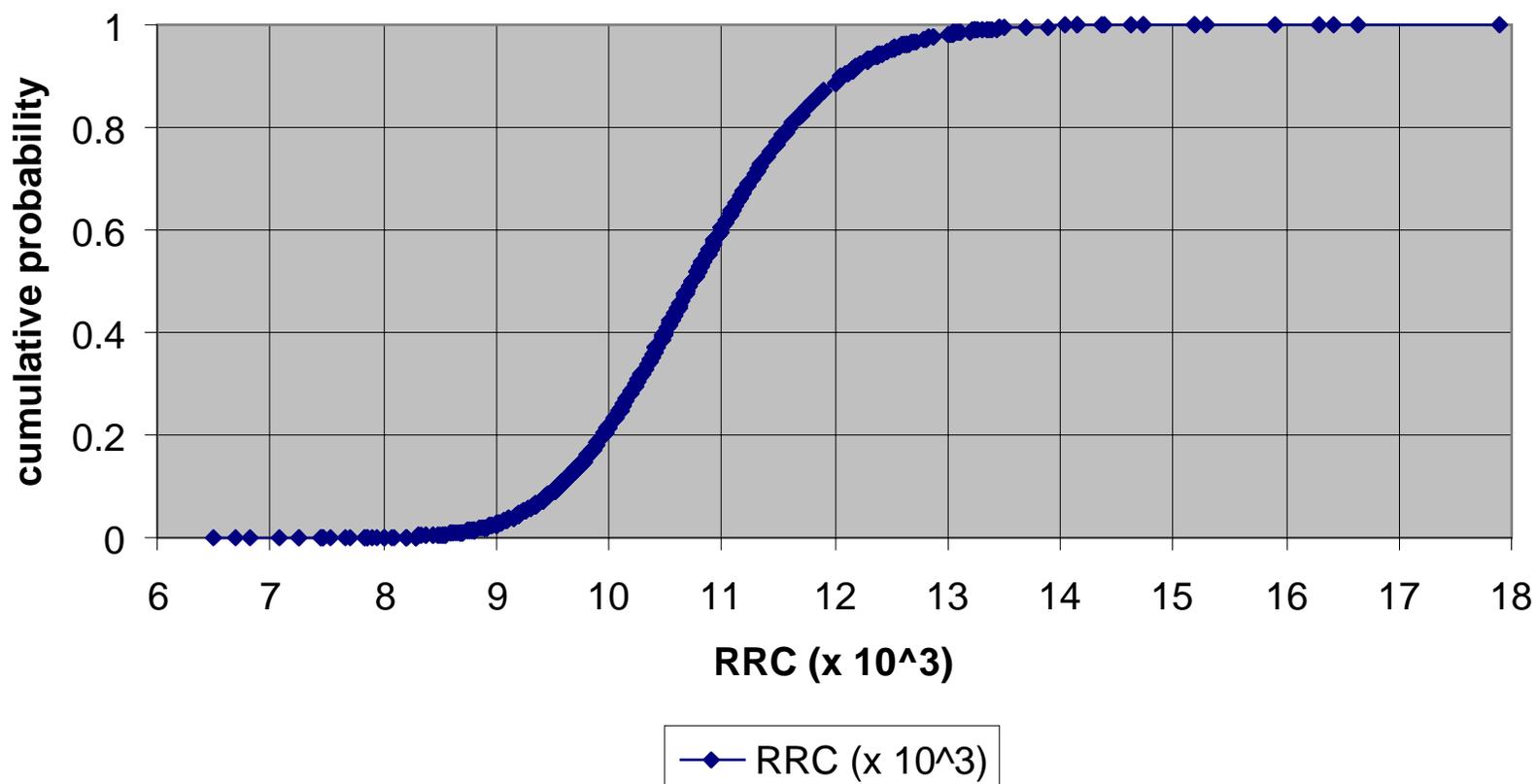


## Distribution of RRC Values: CEC Replacement data only





## Distribution of RRC Values: All Replacement Tire Tests



*Represents analysis in progress; for discussion purposes only at this time.*



# About Tire Efficiency Ratings

- Should be meaningful to consumers
- Should be easily understood by both tire “buyers and sellers” (TRB Report, 2006)
  - Limited number of rating categories
  - Accompanying explanatory literature
- This is an area ripe for statistical analysis and policy dialogue



## Step 4: Develop Tire Efficiency Reporting System

- According to AB 844, tire efficiency reporting should be *based on rating system and established test procedure*
- Tire manufacturers would report to CEC energy efficiency ratings for applicable tires marketed in CA
- Ratings would also be provided to tire retailers and dealers through marketing and sales processes, as UTQG information is provided currently
- RMA member tire manufacturers would develop mechanisms to provide CA tire energy efficiency ratings on website(s)
- Tire manufacturers would certify data and be open to periodic audits to assure compliance



## RMA Supports National Tire Efficiency Information Program

- RMA supports federal legislation that would establish national tire efficiency rating system and consumer information program
- Provision included in Senate-passed version of Energy Bill
- Provision also included in new compromise Energy legislation passed by House yesterday
- Bill under consideration in Senate today



# RMA Supports National Tire Efficiency Rating System

- Provision includes preemption provision that preempts states other than California from enacting different tire efficiency rating and information program
- CEC and NHTSA potentially will both be developing tire efficiency rating systems
- Consistency between these two programs would best serve consumers
- RMA is committed to facilitating maximum coordination in the development of both programs



## EU Developments

- European Commission is also developing tire efficiency rating system and consumer information
- US tire industry is interested in exploring synergies among CA, national and EU systems



## RMA Recommendations for Moving Forward

- 1) Adopt SAE J1269 single point test as reference test
- 2) Use CEC data plus RMA data to characterize marketplace
- 3) Begin formal dialogue among stakeholders to develop rating system
- 4) Establish rating system so that tire manufacturers have structure to begin providing consumers with tire efficiency information
- 5) Establish reporting mechanism