

**RUBBER MANUFACTURERS ASSOCIATION
EISA TIRE MAINTENANCE EDUCATION REQUIREMENT ASSESSMENT
AUGUST 2009**

RMA advocated for and supported the inclusion of a tire fuel efficiency rating system and consumer information program in the Energy Independence Security Act (EISA) of 2007¹. Additionally, RMA successfully advocated for a provision to require NHTSA to conduct a national tire maintenance consumer education program that would help remind consumers that proper tire care is essential to maximizing the fuel economy.

Sec. 32304A. Consumer tire information

`(a) Rulemaking-

`(1) IN GENERAL- Not later than 24 months after the date of enactment of the Ten-in-Ten Fuel Economy Act, the Secretary of Transportation shall, after notice and opportunity for comment, promulgate rules establishing a national tire fuel efficiency consumer information program for replacement tires designed for use on motor vehicles to educate consumers about the effect of tires on automobile fuel efficiency, safety, and durability.

`(2) ITEMS INCLUDED IN RULE- The rulemaking shall include--

`(A) a national tire fuel efficiency rating system for motor vehicle replacement tires to assist consumers in making more educated tire purchasing decisions;

`(B) requirements for providing information to consumers, including information at the point of sale and other potential information dissemination methods, including the Internet;

`(C) specifications for test methods for manufacturers to use in assessing and rating tires to avoid variation among test equipment and manufacturers; and

`(D) **a national tire maintenance consumer education program including, information on tire inflation pressure, alignment, rotation, and tread wear to maximize fuel efficiency, safety, and durability of replacement tires.**²

The agency recognizes this directive in its NPRM:

As a part of the consumer information program, NHTSA must develop a national tire maintenance consumer education program, which must include information on tire inflation pressure, alignment, rotation, and treadwear to maximize fuel efficiency, safety and durability of replacement tires.³

However, much of the NPRM description of agency education efforts is focused on informing consumers about the new rating system for tire fuel efficiency, rather than tire maintenance. As a requirement under EISA, NHTSA should have included proposals to describe how the agency would educate motorists about tire maintenance.

¹ Public Law 110-140, 121 Stat. 1492 (Dec. 18, 2007)

² Id.

³ Fed. Reg. 29544

VIII. NHTSA's Consumer Education Program

As noted elsewhere in the notice, section 111 of EISA requires that the tire fuel efficiency consumer information program for replacement tires include “a national tire maintenance consumer education program including, information on tire inflation pressure, alignment, rotation, and treadwear to maximize fuel efficiency, safety, and durability of replacement tires.” 49 U.S.C. 32304A(a)(2)(D). In order to develop the most effective communication materials to comply with this requirement, the agency conducted consumer testing in January 2009 on informational materials and potential tire labeling.

The goals of this research were to (1) explore reactions to consumer expectations for a tire fuel efficiency rating program; (2) measure feedback related to the effectiveness of the communication materials used to convey the tire labeling information; and (3) gauge consumer preferences of tire label designs presented to determine how best to design a consumer friendly label for the program. Consumers have expressed interest in ways this new information should be conveyed. NHTSA is using consumer testing research to help maximize consumer understanding of the program and to develop communication materials to assist consumers in making more educated tire purchasing decisions.

NHTSA requests comments on the most effective way to establish and implement a consumer education program to fulfill the statutory requirements and purposes behind today's proposed tire fuel efficiency consumer information program.⁴

The NPRM discusses point of sale information for new consumer information on tire fuel efficiency; outreach to universities and high schools; exhibits and conferences at relevant venues to promote the new rating system; paper brochures and; partnership development. Yet, no specific plans are discussed for national consumer tire maintenance program.

The NPRM notes prior efforts since 2001 to educate consumers about tire care and maintenance and mentions information available at www.safercar.gov. RMA is aware of NHTSA efforts in this regard and has appreciated the agency's assistance and cooperation with RMA's own tire maintenance education efforts. The agency sought assistance from RMA in developing initial literature for its “Tire Safety: Everything Rides On It” effort.

NHTSA has extensive experience with consumer education programs on vehicle safety, impaired driving, child safety seats, air bags and others. This expertise and experience would be very effective to communicate tire care messages.

Be Tire Smart – Play Your PART

RMA has had an ongoing national consumer education program on tire maintenance called “Be Tire Smart – Play Your PART” since 2000. The effort is funded by RMA tire manufacturer members and seeks to improve awareness of the importance of proper tire care. The acronym, “PART” stands for Pressure, Alignment, Rotation and Tread – the four essential elements of tire care.

⁴ Fed. Reg. 29575

In 2002, RMA launched an initiative under the Be Tire Smart program – National Tire Safety Week. RMA consulted with NHTSA in planning the dates for this effort and NHTSA Deputy Administrator Annette Sandberg participated in a highly successful press conference launch of the first National Tire Safety Week in April 2002. NHTSA Administrator Jeff Runge also participated in a Washington, DC-area event for 2005 National Tire Safety Week that earned extensive media coverage.





The Be Tire Smart program participation rate among tire retailers, AAA, state government safety officials, auto dealers and others has grown substantially. For the first National Tire Safety Week in 2002, approximately 1,000 tire retail outlets participated. In 2009, more than 21,500 retail outlets participated by offering Be Tire Smart brochures to consumers.

RMA encourages its retail partners to promote tire maintenance messages as well as free tire pressure service that most tire dealers already provide. Many Be Tire Smart partners use National Tire Safety Week as an opportunity to hold promotions, sales and other activities that can attract consumers who can then receive tire care literature and tips.

Additionally, RMA conducts outreach to high school driver’s education programs each fall by providing notice of a downloadable curriculum product about tire maintenance. Responding driver’s education instructors also receive RMA Be Tire Smart brochures to distribute to students and a tire gauge to demonstrate how to properly check tire pressure.

Materials Available to Tire Dealers/Automotive Service Outlets

Be Tire Smart materials provided free to tire dealers, auto dealers, AAA clubs, auto repair shops, schools, state governments and others.

 <p>Be Tire Smart – English brochure</p>	 <p>Be Tire Smart banner</p>
 <p>Be Tire Smart – Spanish brochure</p>	 <p>Be Tire Smart poster</p>

Media Outreach

A key part of the Be Tire Smart program is media outreach to expand tire care messages to broad segments of motorists. Each year, RMA promotes tire care messages for National Tire Safety Week and in the fall prior to holiday driving periods.

Twice each year, RMA conducts a radio media tour of 15-20 interviews; issues radio news releases; press releases; radio public service announcements and; uses survey data or other efforts to generate news coverage. RMA's web site, www.betiresmart.org, also has extensive tire maintenance tips, downloadable versions of brochures and fact sheets and information for tire dealers and automotive service outlets to become a partner in educating motorists.

Since the program's inception, RMA has conducted consumer phone surveys to gauge the level of motorist awareness of proper tire care. This information is used each year in RMA media outreach to demonstrate the continual need for tire care and maintenance education. RMA has developed a series of questions to determine whether a motorist is "tire smart" by gauging responses to properly checking tire pressure: using the vehicle manufacturer's recommended pressure, checking pressure monthly and checking tires when cold.

The first survey to use this measurement found only 11% of motorists were "tire smart." In the 2009 survey, 18% of motorists were "tire smart." RMA is attaching its 2009 motorist survey to these comments.

Also in 2009, RMA initiated an additional survey project that sought to obtain actual measured tire inflation pressures from vehicles in several markets across the nation. Using a number of Be Tire Smart retail partners, RMA collected measured tire pressures from more than 5,500 vehicles. Overall, the research found:

- Only 9% of vehicles had four properly inflated tires.
- 50% of vehicles had at least one under inflated tire.
- 19% of vehicles had at least one tire under inflated by 8 pounds per square inch (psi.)
- 26% of vehicles had at least one tire under inflated by 6 psi.
- 38% of vehicles had at least one tire under inflated by 4 psi.⁵

Another tire pressure survey is planned for 2010 National Tire Safety Week to develop trend data to help measure the effectiveness of tire maintenance education efforts on motorist behavior.

⁵ <http://www.rma.org/newsroom/release.cfm?ID=268>

NHTSA Needs to Specify A Tire Maintenance Education Plan

RMA and its members have extensive experience in tire maintenance education and stand ready to assist NHTSA's effort to educate motorists in accordance with EISA. RMA has enjoyed prior cooperative efforts with the agency and looks forward to continued efforts to advance important tire maintenance messages. To assist the agency in these efforts, NHTSA needs to specify a plan to implement an education program and provide notice and opportunity to comment on such plan.