

**Comments in Response to the Tire Fuel Efficiency
Consumer Information Program Proposed Rules
Docket No. NHTSA-2008-0121**

On June 22, 2009, the National Highway Traffic Safety Administration released the Notice of Proposed Rulemaking (NPRM) for a Tire Fuel Efficiency Consumer Information Program. The Tire Industry Association (TIA) is submitting these comments on the NPRM on behalf of its members.

TIA is an international association representing all segments of the tire industry, including those that manufacture, repair, recycle, sell, service or use, new or retreaded tires, and also those suppliers who furnish equipment, material or services to the industry. TIA has a history that spans more than 80 years and now has over 6,000 members that operate nearly 15,000 locations.

As requested in Section VII.C. of the NPRM for a Tire Fuel Efficiency Consumer Information Program, TIA is offering comments on “any other dissemination requirements that would ensure that easy-to-understand information is conveyed in a way that is most likely to impact consumers’ decisions and, thus, affect their behavior and save them and our nation fuel and money.” These comments also apply to the request in Section VII.B. “on how to best communicate information to consumers before or during the tire purchasing process.”

In addition, the majority of the focus of the NPRM seems to be in developing a labeling system for rating rolling resistance on tires. This requirement is that a rating system label be affixed to a tire’s tread surface “so as not to be easily removable.” Many tire retail outlets offer consumers hundreds of tires of varying sizes, performance criteria, load indices, models and brands. Tire retailer showrooms are not large enough to display so many tires and those tires that are displayed may or may not have a paper tread label. Since the current paper tread label is removed by the retailer when the tires are installed, consumers are unlikely to see the actual label that had been affixed to their new tires. Therefore, any requirement under this NPRM to place rating information on the paper tread label would not help consumers to make a tire choice for their vehicle. However, it will be critical for the tire sales personnel to be able to convey this information on those rare occasions when the consumer does come into contact with the tire label.



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Point of Sale Consumer Education

The NPRM outlines several methods of educating consumers; however, TIA believes NHTSA continues to underestimate the extreme importance of the **dialog between the sales associate and the consumer at the point of sale**. In Section VII.B. of the NPRM, it states that NHTSA “believes[s] that the most successful method of encouraging consumers to consider the new ratings at the point of sale is to have a poster in each tire retailer/dealer location that would be visible to consumers.” However, based on TIA’s experience representing the retailers and given the consumer research described below, a poster or pamphlet should be an additive feature, not the core vehicle for information dissemination. Unfortunately, Section VIII.B.2., which focuses solely on the point of sale efforts, does not even mention the dialog between salesperson and consumer as a viable means of education.



In many tire retailers’ showrooms, the size and variety of product promotions makes a poster oriented campaign impractical. The consumer’s attention gets lost in the visual chaos. Also, commercial marketing requirements limit the space available for large public service announcement posters.

The NPRM states in Section VII.B. that participants in the UC Davis workshop noted “many tire purchases are unplanned, where consumers needed to take immediate action to restore their vehicle.” Participants “further agreed that while some consumers do “defensive” research prior to scheduled or planned tire purchases in an attempt to avoid getting taken advantage of by sales associates, very few do “offensive” research such that they know precisely what tires they want.”

Further, the research conducted and referenced in Section VII.B., “found that the connection between fuel efficiency and tire selection was not brought up unaided,” and that the participants made the connection between the two only after “discussion and probing.”

This research reinforces the importance of face-to-face communications. If consumers generally do not conduct research prior to making a purchase, nor fully understand the connection between fuel efficiency, tire selection, and tire maintenance without explanation, it is critical that this information be effectively presented to them verbally at the point of sale.

TIA feels strongly that the efforts mentioned in the NPRM, such as an informative poster, interactive mediums, website development, and paper brochure materials, will be inadequate to attain the goals of consumer education “about the effect of tires on automobile fuel efficiency, safety, and durability.” Further testing should be conducted to evaluate the effectiveness of the poster and other means versus a face-to-face dialog.

TIA was present at the California Energy Commission (CEC) workshop held at UC Davis mentioned above, where every segment of the tire industry was well-represented. During discussions about the complicated nature of rolling resistance’s relationship to other tire ratings and the consumer’s ability to grasp its meaning in the limited amount of time during the tire purchase, a consensus was quickly reached that the tire salesperson would be the most likely (and possibly only) source for the dissemination of this crucial information.

Further, in section VI.A.2.i the NPRM states that “NHTSA is concerned about the potential negative safety consequences that may occur if consumers, motivated by potential fuel savings, begin to purchase tires with better rolling resistance ratings but are unwilling to spend additional money to also maintain wet traction levels.” Thus it becomes obvious that the tire seller has an increasingly critical role in properly educating the consumer about the benefits and impacts of their tire choice.

According to data gathered by industry press, the independent tire dealer sells about 60 percent of the 240 million passenger and light truck replacement tires sold annually in the United States. A conservative estimate of TIA membership in this group would be 35-40 percent. TIA’s membership also consists of some large chain stores, such as Costco, not included in this data set. Clearly, TIA’s members reach a significant number of consumers. More to the point, in terms of the objectives of the NPRM, no other entity has this opportunity to communicate directly with the consumer at the time of tire purchase. As stated in the opening summary of the NPRM (I,A), “Motorists must be alerted to the fact that even small losses of inflation pressure can reduce tire treadwear life, fuel efficiency, and operating performance.”

In section II.3, reference is made to the April 2006 National Academy of Sciences (NAS) Special Report 286, Tires and Passenger Vehicle Fuel Economy: Informing Consumers and Improving Performance. The conclusion of the report cites the effect of reduction of rolling resistance of replacement tires (1 to 2 percent increase in fuel economy resulting in 1 to 2 billion gallons of fuel saved per year), and notes a substantial fuel savings can be gained.

The NPRM goes on to quote from the NAS report stating, “The 2006 NAS Report concluded that consumers, if sufficiently informed and interested, could bring about a reduction in average rolling resistance by adjusting their tire purchases and by taking proper care of their tires once in service, **especially by maintaining recommended inflation pressure.**” TIA would like to emphasize this last point and data suggests its view that maintaining proper tire inflation pressure may be an even greater factor influencing savings in fuel economy than the actual rolling resistance rating of the tire.

Given TIA’s large national membership, it is evident that when sufficiently trained, sales staff at TIA’s member stores could have a rapid, meaningful impact on the nation’s consumers and their ability to contribute to the reduction of fuel consumption and greenhouse gas (GHG) emissions by properly maintaining their tires. TIA has, over the years, developed strong relationships with other automotive aftermarket groups including the service station and automotive repair shop owners.

With proper funding, TIA’s consumer information program would be made readily accessible to anyone in the auto servicing business to ensure as complete consumer coverage as possible, increasing the overall benefits of fuel efficiency and GHG emissions reductions on an even greater basis.



The sales associate's dialogue with the customer at the point of sale is by far the greatest influence on customer tire choice.

Training Retail Sales People

In order to have an effective education program, one must understand and appreciate the distinction between active and passive communication. TIA believes that the tire salesperson is the key to actively communicating with the motoring public. In contrast, a tire label and poster in a sales office are passive communication tools and only a **starting point** for the education of the consumer.

For the most part, tire retailers provide a multitude of automotive repair and maintenance services. As a result, these businesses have constant foot traffic from motorists with issues other than tires, such as windshield wipers, batteries, and oil changes. Every consumer visit to the facility is an opportunity to reinforce the ongoing consumer education regarding tire maintenance. This also provides an excellent occasion to check the inflation of the tires, a practice which has been mandated in California. This person-to-person contact is a critical advantage to the tire retailing industry and the point-of-sale represents the best opportunity to educate the consumer regardless of the type of automotive service being purchased.

If the NHTSA wants to reduce emissions by educating consumers on the environmental benefits of low rolling resistance tires and tire inflation pressure maintenance, then it has to start with qualified people at the sales counter.

Working with NHTSA and with proper federal support, TIA is prepared to embark on a comprehensive course of training tire sellers and to keep tire maintenance in the consumers' thinking through massive public outreach. TIA can quickly adapt to a variety of training requirements as the Association has trained over 44,000 tire technicians and has started a series of tire safety videos for the public with support and cooperation of the tire manufacturers.

If the tire sellers are not educated to "explain" the purpose of the poster beyond the "we're required by law to post it" attitude, NHTSA cannot expect to see a significant increase in the number of low rolling resistance tires that are purchased or an increase in regular tire maintenance. These tires are typically more expensive, so the sales associate will need to clearly explain the benefits of choosing a more fuel-efficient tire and overcome the skepticism of the consumer. Without an education component for tire sellers, the poster and new label are destined to become as ineffective as the Uniform Tire Quality Grading ratings have been since they were instituted back in 1978.

The TIA Training Model

In order to effectively communicate valuable information to the consumer at the point of sale, the education program must properly prepare the retail sales force for engagement with the consumer. The Program must be created and managed by an entity with experienced trainers and an expansive network to ensure that retail tire sellers throughout the nation are adequately educated so they can in turn educate the consumers. For example, the tire seller must be instructed to **initiate the conversation** and take the time to fully engage in an open dialog with the consumer. The dialog needs to include opportunities for questions to make certain the consumer is fully informed and successfully engaged as an active part of the process.

TIA advocates the creation and implementation, with NHTSA's direct supervision and advisement, a program to engage the consumer in person to person education from a trained sales force based on its current training models which are used to educate tire technicians **on a variety of maintenance and diagnostic techniques**. The Program should be designed to provide retail tire sales personnel with basic information on: 1) the new system used to rate rolling resistance, treadwear and traction; 2) how consumers can use the USDOT's new efficiency calculator to easily compute how much savings will be associated with the type of tire being purchased; 3) tire replacement guidelines and recommended inflation/maintenance practices; and 4) the personal benefits to the consumer in fuel savings and reduced GHG emissions as a result of proper tire maintenance and inflation.

Using the "train-the-trainer" approach that has helped TIA reach more than 44,000 tire technicians since 1997, the Program would be able to reach tire retailers across the United States. The TIA model would hold classes in 63 different cities that encompass 43 states and would conduct additional classes in Spanish for selected cities throughout the country, primarily in Florida, Texas, California and other areas of the southwest.

As part of the current TIA technician training and certification programs, each student is required to demonstrate that they can perform the tasks covered in the classroom, in the field. The new Program would incorporate the same concept by requiring each student trainer to describe the rating system and use/explain the NHTSA efficiency calculator in the presence of a TIA professional instructor.

The student will also be required to make a presentation to demonstrate his or her ability to teach each portion of the Program in order to receive the accreditation for successfully completing the Program. All of these skills will be outlined on a form that must be signed by the TIA staff trainer to document the student's proficiency as an instructor.

The final step to become an accredited TIA instructor for the Program is a comprehensive written examination. Much of the course content will be focused on tire design and construction so sales personnel have a better understanding of how rolling resistance and low inflation pressure contributes to premature tire wear, lower fuel mileage, and increased GHG emissions.

Utilizing this model, retailers of any size in any part of the country would be able to send at least one employee to a regional training class where they will have the opportunity to ask questions and get answers from a professional TIA staff instructor. Non-members, with the cooperation of manufacturers and wholesalers, will have the same access to this training. This offers the advantage that small tire dealers would be able to avoid the travel expenses while the larger chains will be able to utilize trainers and managers in the Program to train their own sales personnel.

TIA's goal is to train sales personnel to become effective conduits for consumer education. That way TIA can ensure that every employee who comes in contact with the customer has the credentials to help motorists select the right tires based on the new rating system and then maintain those tires, which will reduce GHG emissions and increase national fuel economy.

Another advantage of the train-the-trainer approach is that it allows industry organizations, such as state and regional tire dealer associations, to conduct the field classes as a member benefit. TIA has been using this model for years throughout the United States and is confident that associations already conducting TIA technician training for their members would be able to easily incorporate this fuel efficiency program into their regional sales training. Several major tire manufacturers and wholesalers also have employees who are accredited TIA instructors to train technicians for their customers.

In the context of a national consumer education program, the multiplier effect of this training model is significant. TIA has certified more than 2,800 instructors who are largely responsible for training and certifying more than 44,000 technicians. Commercial and retail tire dealers have measurably reduced accidents and workers compensation claims by using the train-the-trainer approach to educate technicians. These companies would concur that having TIA Certified Instructors on staff or access to a TIA Certified Instructor through a supplier, manufacturer, or state/regional tire dealer association has delivered noticeable results. Since consumer education must take place at the point of sale in order for it to be effective, the best method for ensuring accurate information is to make sure the salesperson is trained in a uniform, certified fashion.

TIA Possesses the Infrastructure to Implement a National Training Program

As the recognized leader in tire technician training and certification since 1997, TIA has become the industry's primary source for training and educational programs. TIA also processes thousands of exams on an annual basis. Thus, the Association has the infrastructure to develop, deliver and support a national train-the-trainer program for tire sales personnel already in place. Utilizing this existing infrastructure will provide a substantial cost savings. TIA has in-house experts that can develop the tire inflation, maintenance, and fitment components of the Program. This will allow NHTSA to begin the consumer education on tire maintenance and inflation while the USDOT and the tire manufacturers develop the new rating system for rolling resistance. Once the rule is final, TIA will package the section on rolling resistance and its effect on GHG emissions into the Program.

One of the primary reasons that TIA's technical training is highly regarded in the tire industry is the people behind the content. TIA employs a chief staff developer who actively participates on industry councils and organizations in order to maintain constant contact with the manufacturers. TIA's training department is widely recognized as a team of leading experts on all types of tire services and has produced training videos for major tire and wheel manufacturers on a variety of topics.

TIA also has two full time instructors and one full time consultant who are responsible for regional technician training and certification throughout North America. Collectively, these individuals have more than 80 combined years of experience in the tire industry as technicians, managers, and most importantly, developers and trainers.

Another reason for TIA's success in technical training is the Association's ability to work with the manufacturers to develop a consensus. In 2005, TIA released the *Passenger and Light Truck Tire Conditions Manual* to help sales personnel analyze irregular treadwear patterns and determine the causes of various types of tire failures. TIA worked with seven major tire manufacturers over the course of three years to assemble the photos and accompanying verbiage. Obtaining approval from the engineering and legal departments within each tire company was possible because TIA has professionals on staff with the experience and knowledge to create training materials that are consistent with industry accepted practices and guidelines.

Experience Developing Tire-Related Marketing Tools

The Program contemplated by the NPRM will require implementation by an entity with experience developing marketing tools and the ability to work cohesively with NHTSA to complement the salesperson's "conversation with the consumer." *Passenger Tire Replacement* is a video marketing product created at the behest of Bridgestone Tire that is presented to the consumer at the retail site and clearly outlines the minimum guidelines that consumers should follow when selecting replacement tires. It also educates motorists on the importance of installing two new tires on the rear axle of front-wheel-drive vehicles when four new tires cannot be purchased at the same time. By demonstrating the effects on a test track, TIA was able to demonstrate to the driver what will happen when two new tires are installed on the front axle while worn tires are still on the rear.

TIA also worked with Michelin to produce *Wheel End Safety*, another educational video directed toward consumers, specifically those who operate commercial trucks. In this instance, TIA was able to manipulate a "wheel-off" so that the out-of-control wheel is shown striking a stationary vehicle. The video is incredibly dramatic and definitely gets the attention of the viewer with regards to the serious nature of these accidents.

With the focus on safety and following proper inspection, maintenance and installation procedures, TIA was able to convey an important message while providing the type of high-impact visuals that consumers can easily remember.

TIA's approach is to provide the salesperson with the training tools they need to reach the customer in a relatively short amount of time. When the motorist makes first contact with the retailer, they are often in need of a specific automotive service, such as tires, or have a problem with their vehicle that requires attention. After agreeing on the services to be completed and the cost estimate, the work proceeds which typically results in 30-60 minutes in the waiting area.

TIA intends to capitalize on that time and give the salesperson the necessary information to effectively educate the consumer.

As indicated above, after initiating the dialog with the consumer, the retailer would present a brief interactive computer-based program. This tool will use a combination of video, animation, and interactive exercises to engage the motorist and reinforce how low rolling resistance tires and tire inflation pressure maintenance results in cost savings, a reduction in GHG emissions, and a smaller carbon footprint. Consumers will also be able to see for themselves what happens when industry guidelines for tire replacement and fitment are not followed and how they affect economy and performance. As a follow-up device, TIA would also send the customer a free high-quality air gauge with instructions on how best to use it to check and maintain proper inflation. In addition, when they receive their air gauge, the motorist will also get access to a special website where they can post their tire pressures and mileage every month in order to receive a carbon footprint score.

Incentives for Point of Sale Effectiveness

TIA believes that the tire sales specialist must not only be rigorously trained but also incentivized in order to take full advantage of this opportunity to interact with the consumer. The TIA model provides each salesperson, regardless of whether he or she is an Association member, with a unique ID number that would be entered into the computer before and after the consumer contact. Participating sales people can track their progress on a special website to determine their state and national standing. TIA will offer awards and cash incentives to the top consumer trainers in each state, with special TIA recognition and bonuses for national winners.

In order to provide the incentive for owners or managers to participate in the Program and train their sales people to educate consumers, TIA will maintain an Internet database of the locations with accredited personnel, both inside and outside of the TIA network, so informed consumers can seek out the businesses that are proactive in the fight against global warming. TIA, in cooperation with NHTSA, will develop the necessary signage and window decals to help these companies send the message that they are a resource for consumer education in their communities. In addition, participating retailers will have access to TIA/NHTSA displays and promotional materials, such as videos and brochures, so they can continue the outreach to schools, local groups, and regional trade shows.

With experienced industry experts, combined with a proven infrastructure and training model for conducting and supporting regional train-the-trainer seminars, TIA is the obvious choice to develop and implement a national tire sales training program. Of course, content for the Program will reflect an industry and USDOT partnership and consensus on all aspects of tire application, fitment, maintenance and ratings.

TIA is the only organization with the experience and expertise to develop and deliver an effective national tire sales training program that must reach tens of thousands of points of sale. The Association is widely recognized as the leader in technical training and has proven it can work with the manufacturers to deliver educational programs that reflect an industry consensus. And most importantly, TIA members are on the front line with motorists on a daily basis and have consistent person-to-person contact with consumers at the point of purchase for new tires. A national train-the-trainer program will have an immediate impact on how people buy tires because the people selling them will be trained and qualified to explain how low rolling resistance and inflation pressure maintenance impacts GHG emissions, creates fuel savings, and saves the consumer money.

Thank you for your consideration of these comments.

Sincerely,



Roy Littlefield
Executive Vice President
Tire Industry Association