



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

Administrator

1200 New Jersey Avenue, SE  
Washington, DC 20590

May 31, 2016

The Honorable Christopher A. Hart  
Chairman  
National Transportation Safety Board  
490 L'Enfant Plaza East, SW  
Washington, DC 20594

Dear Chairman Hart:

This letter responds to the Safety Recommendations issued by the National Transportation Safety Board (NTSB) to the National Highway Traffic Safety Administration (NHTSA) on November 12, 2015. A total of nine Safety Recommendations were issued to NHTSA as a result of four crash investigations (HWY14MH006, HWY14FH007, HWY14H008, and HWY14H011), the December 2014 Passenger Vehicle Tire Safety Symposium, and a Selected Issues in Passenger Vehicle Tire Safety special report (SIR-15-02). Our responses to the new Safety Recommendations are discussed below, along with the requested designation.

### **Safety Recommendations**

**H-15-27:** Seek authority to require all tire dealers to register tires at the point of sale, and then require them to do so.

**H-15-28:** Develop voluntary standards, in consultation with tire industry leaders, for a computerized method of capturing, storing, and uploading tire registration information at the point of sale.

**H-15-29:** Include fields on the tire registration form for the purchaser's e-mail address, telephone number, and vehicle identification number to assist manufacturers in locating and notifying owners of recalled tires.

**H-15-30:** Require tire manufacturers to include the complete tire identification number on both the inboard and outboard sidewalls of a tire.

**H-15-31:** Require tire manufacturers to put the safety recall information for their tires on their websites in a format that is searchable by tire identification number as well as by brand and model; if necessary, seek legislative authority to implement this recommendation.

**H-15-32:** Modify the tire recall search feature on your website to allow users to search for recalls by tire identification number as well as by brand and model.

**H-15-33:** Determine the level of crash risk associated with tire aging since the implementation of FMVSS Nos. 138 and 139; if based on this determination, it appears that the aging-related risk should be mitigated, develop and implement a plan to promote the tire aging test protocol to reduce the risk.

**H-15-34:** Develop a consensus document with input from the automotive industry, the tire industry, and safety advocacy groups that addresses tire aging and service life and that also includes best practices for those consumers whose tires are most at risk of experiencing an aging-related failure.

**H-15-35:** Develop, in consultation with automotive and tire industry representatives, a tire safety action plan to reduce or mitigate tire-related crashes by promoting technological innovation and adapting regulations as necessary.

### **Response**

Recommendations H-15-27, -28, and -29 overlap with mandates in Sec. 24333 of the FAST Act amending 30117(b) of title 49, United States Code. NHTSA is currently developing a response to all topics covered in the FAST Act, including those in Sec. 24333. While the agency determines how to move forward on all FAST Act mandates, we request these recommendations be classified as Open – Acceptable Action.

### **H-15-30**

NHTSA proposed requiring the full tire identification number (TIN) on both sides of a tire when developing Federal Motor Vehicle Safety Standard (FMVSS) No. 139 for passenger car tires in a December 2001 notice of proposed rulemaking (66 FR 65536). However, comments received in response to this proposal and a visit to a tire manufacturing plant by NHTSA staff revealed that there are safety and cost issues associated with marking both sides of the tire with the date code portion of the TIN. Tire manufacturers imprint the date code onto the tire during the molding process. In order to include the date code on both sides of the tire, a worker would need to climb inside the hot mold used to make tires every week and change out the date. An alternative is for a manufacturer to etch a date into the side of a tire after the tire has been removed from the mold, however this would require additional tooling and result in additional costs making any proposed regulation difficult to justify. Further background information may be found in the tire safety information final rule preamble for FMVSS No. 139 (67 FR 69600 at 69612-69613 SVII.C.1.d). We request that the recommendation be classified as Closed – Acceptable Alternate Response.

#### **H-15-31**

The FAST Act requires NHTSA to establish a publicly available electronic database of tire recall information that is searchable by tire identification number and other appropriate criteria. We are currently investigating our legislative authority to implement this requirement. We request this recommendation be designated Open – Acceptable Action.

#### **H-15-32**

The agency is investigating the feasibility of searching by TIN as part of the FAST Act. We will update NTSB staff as we progress. We request that this recommendation be classified as Open – Acceptable Action.

#### **H-15-33**

In 2014, the agency published a summary of its tire aging research. As part of that report, analysis of NHTSA test data and crash data suggested that the risk associated with tire aging had been significantly reduced because of the FMVSS Nos. 138 and 139 rulemakings. The agency is currently evaluating the effectiveness of FMVSS No. 138 Tire pressure monitoring systems and will publish the results of this regulatory review when they become available.

We note that the FMVSS Nos. 138 and 139 rulemakings became effective on September 1, 2007. Most tire manufacturers recommend discontinuing use 10 years after the date of manufacture because of possible concerns with tire aging. Therefore, there is not a significant amount of crash data currently available with which to analyze FMVSS No. 139 compliant tires that have aged significantly past a manufacturer's suggested lifespan. NHTSA will continue to monitor crash data and evaluate any safety concerns. We request this recommendation be classified as Open – Acceptable Action.

#### **H-15-34**

NHTSA's Safercar.gov website informs consumers buying new cars and motor vehicle equipment. This website includes a dedicated page for tire information called TireWise ([www.safercar.gov/tires](http://www.safercar.gov/tires)). The TireWise page contains valuable consumer information related to understanding tire labels and buying the right tire. More importantly, TireWise contains consumer focused safety advice on tire maintenance and tire aging. The tire aging information for a consumer is comprehensive and covers the tires most likely to be at risk, ways to extend the service life of a tire, means to identify the age of a tire, and general industry guidelines for removing a tire from service for an age related reason. NHTSA feels that the TireWise website fully addresses recommendation H-15-34. We request that this recommendation be classified as Closed – Acceptable Response.

### H-15-35

NHTSA is currently conducting research on some of the technologies identified in the NTSB special investigation (e.g. Electronic Stability Control, wet grip, rolling resistance). When we have fully analyzed this issue we will respond to the NTSB with how we intend to proceed. We request that this recommendation be classified as Open – Acceptable Response.

In summary, we are requesting that Safety Recommendations H-15-27, H-15-28, H-15-29, H-15-32, H-15-33, and H-15-35 be classified as Open – Acceptable Action. Due to the safety and cost issues associated with marking both sides of the tire with the date code portion of the TIN that NHTSA was made aware of during the development of FMVSS No. 139, we request Safety Recommendation H-15-30 be Closed – Acceptable Alternate Action. We request Safety Recommendation H-15-34 be Closed – Acceptable Action, because our TireWise website has already delivered on the information recommended.

We appreciate NTSB's efforts to examine and communicate importance of tire safety and maintenance. As we say, "The only thing between you and the road are your tires." If you have any questions, or require additional information, please contact me, or Ms. Melanie O'Donnell, our NTSB liaison in the Office of Government Affairs, Policy and Strategic Planning, at 202-366-0689 or by email at [melanie.odonnell@dot.gov](mailto:melanie.odonnell@dot.gov).

Sincerely

A handwritten signature in black ink that reads "Mark R. Rosekind". The signature is written in a cursive, flowing style with a prominent loop at the end of the last name.

Mark R. Rosekind, Ph.D.