



To: Office of the United States Trade Representative

Date: 29 October 2012

Re: U.S. – E.U. Regulatory Compatibility
Federal Register Notice, Volume 77, Number 189, September 28, 2012
Request for comments from the public on U.S. – E.U. Regulatory Compatibility
Docket Number: USTR-2012-0028

On behalf of members of the Rubber Manufacturers Association (“RMA”)¹, representing interests of tire manufacturers in the United States (“US”), we are responding to the request for comments from the Office of the United States Trade Representative (“USTR”), on the topic cited above. Radial pneumatic tires for passenger cars are becoming global products for use anywhere in the world when mounted as original equipment on new vehicles, which are themselves marketed on a global basis. There is also a growing demand for globally marked replacement tires, which can be mounted on vehicles in many countries, such as for example in the US and the European Union (“EU”).

Globalization of the tire industry creates significant opportunities for EU and US manufacturers to deliver better and more cost efficient tires, but it also requires, as a minimum starting point, harmonization of technical provisions at the bilateral, EU and US level. Radial passenger tire performance applications and usage are essentially identical in both the US and EU countries. If harmonization of tire marking and performance requirements can be achieved, in the transatlantic regions, it could ultimately result in lower regulatory costs, with less red tape and more business and job creation in the transatlantic region and beyond. We have since 2006, been working with the US Department of Transportation (“DOT”), National Highway Traffic Safety Administration (“NHTSA”), and the EU and the European Commission (“EC”), plus individual countries within the EU to reduce excessive regulatory costs, by eliminating unjustified regulatory differences and redundancies, while respecting each other’s right to protect public health, safety welfare and the environment.

To date, the United Nations Economic Commission for Europe (“ECE”), World Forum for Harmonization of Vehicle Regulations (WP.29) has provided the setting and structure for

¹ RMA’s membership includes all of the country’s major tire manufacturers: Bridgestone Americas; Continental Tire The Americas, LLC; Cooper Tire & Rubber Company; Michelin North America, Inc.; Pirelli Tire North America, Inc.; The Goodyear Tire & Rubber Company; Toyo Tire Holdings of Americas Inc.; and Yokohama Tire Corporation.

these government/industry efforts at streamlining and harmonizing many of the requirements in existing DOT and ECE regulations² for radial passenger car tires. We might add that many countries beyond just the EU and US are active participants in the ECE's development of a harmonized global technical regulation ("GTR") for radial passenger and light truck (commercial) tires, including for example: Australia, Canada, China, India, Japan, Korea, and Russia to name a few. To the extent that these non EU or US countries have regulatory requirements different from the DOT or ECE they have been analyzed and covered by one or both of the EU or US requirements. Expected completion date for the tire GTR is 2013 for passenger tires and 2014-15 for light truck commercial tires, at which point the "global tire categories" will be fully defined and qualified. Both governments have essentially agreed to this approach, provided that upon their individual reviews of the final ECE documents, there will be no reduction in safety. This is all in place to happen within the next two or three years.

What remains to be accomplished is for the EU/EC and the DOT-NHTSA/USTR to take cooperative bi-lateral leadership roles in promoting adoption of a "global tire" symbol, ideally via the efforts of UN/ECE/WP.29. Such a mark would be permanently marked on the sidewall of qualified radial passenger car and light truck (commercial) tires, signifying compliance with the requirements for GTR-tires and all applicable performance requirements as defined by US and ECE regulations. Such tires will be produced to the highest quality standards as contained in the soon to be finalized UN/ECE/WP.29 *"Global Technical Regulation, Harmonized Provisions Concerning Pneumatic Radial Tyres for Passenger and Light Truck (Commercial) Vehicles"*.

We would very much like to have the opportunity to meet with a representative from the USTR's office to further discuss our concerns and suggestions cited above and questions that you may have. Thank you for your interest and allowing us to submit these comments.

Sincerely,



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² See ECE Regulations 30, and 54 and 117 annexed to the UN/ECE 1958 Agreement as well as US 49 CFR, US DOT-NHTSA, Federal Motor Vehicle Safety Standard ("FMVSS") Parts 571.109 and 571.139, plus Parts 574 and 575.