



RUBBER
manufacturers
association



**EUROPEAN
TYRE & RUBBER
manufacturers'
association**

May 10, 2013

Ambassador Demetrios Marantis
United States Trade Representative (Acting)
600 17th Street, NW
Washington, DC 20508

Re: Request for Comments Concerning Proposed Transatlantic Trade and Investment Agreement (“TTIP”); 78 Fed.Reg. 19566 et seq. (April 1, 2013), Docket No. USTR-2013-0019 (“Notice”)

Dear Ambassador Marantis:

On behalf of the Rubber Manufacturers Association (“RMA”)¹ and the European Tyre and Rubber Manufacturers’ Association (ETRMA)², we are pleased to submit comments in response to the cited Federal Register notice. As the trade associations presenting the global tire industry in the United States and the European Union, we believe that the Transatlantic Trade and Investment Agreement (TTIP) presents an opportunity to address issues raised but not addressed in the development of the Global Technical Regulation (GTR) for light vehicle tires.³ In a very competitive global tire industry, the reduction of technical barriers would reduce unnecessary and duplicative testing and lower costs without sacrificing safety.

I. The GTR for Light Vehicle Tires

Modern state-of-the-art radial passenger tires are critical to safe performance of today’s passenger cars, light trucks and vans. The global tire industry has been active since 1997⁴ with efforts to harmonize “best regulatory practices” into a global regulatory model for these tires. At least 33 nations are currently contracting parties to the 1998 Global Agreement and representatives from many of these

¹ RMA represents the tire companies manufacturing tires in the United States. RMA’s membership includes: Bridgestone Americas; Continental Tire The Americas, LLC; Cooper Tire & Rubber Company; Michelin North America, Inc.; and The Goodyear Tire & Rubber Company.

² ETRMA represents the tire manufacturers in Europe. ETRMA’s corporate members are: Apollo Vredestein, Bridgestone, Continental, Cooper Tyres, Goodyear Dunlop, Hankook, Marangoni, Michelin, Mitas, Nokian Tyres, Pirelli, Trelleborg.

³ “Light vehicle tires” are radial tires for use on passenger cars and also radial tires for use on light trucks and vans with a load range no greater than “E” (maximum gross vehicle weight rating of 10,000 pounds).

⁴ Efforts to harmonize global tire regulations began with the Trans-Atlantic Business Dialog and have continued from 1998 to the present with the United Nations World Forum for the Harmonization of Vehicle Regulations.

nations have actively participated in the development of the Global Technical Regulation (“GTR”) for tires. The current GTR informal working group on light vehicle tires began in 2006, sponsored by France and chaired by the United Kingdom (UK).

A. Description of the GTR for Light Vehicle Tires

The goal of the GTR process for tires is to establish a GTR in two phases: Phase I – harmonized requirements for passenger car tires and Phase II – harmonized requirements for light truck and commercial tires. The draft GTR for light vehicle tires is based on existing US DOT Federal Motor Vehicle Safety Standards (FMVSS 139 and 109) and existing UN-ECE tire regulations (R 30 and R 117). Existing regulations from other countries also were considered. The criteria are included in the tire GTR as part of a harmonized modular structure.

The draft GTR for light vehicle tires includes general requirements and two optional modules. The general requirements include marking, dimensions, harmonized high speed safety test, endurance/low pressure test and tire wet grip adhesion. The two modules containing optional requirements are Option 1 (“Plunger Energy Test and Bead Unseating Test”) and Option 2 (“Tyre Rolling Sound”).

Contracting Parties to the 1998 Agreement have, over the last several years, received multiple, detailed presentations on existing and proposed regulatory requirements for passenger car tires and to debate the merits of each. The product of this years-long process has resulted in a robust proposed global regulation containing regulatory practices from existing diverse regulations for light vehicle passenger car tires.

B. Benefits of a GTR for Light Vehicle Tires

The market for passenger car and light truck vehicles is global, as is the demand for original equipment and replacement tires for these vehicles. Light vehicle tires must comply increasingly with global regulatory practices whether the actual service life will occur in the Americas, Europe, Middle East, Asia or Africa. The light vehicle tire GTR process is an effective way to identify and, as appropriate, apply regulatory practices from among the many nations participating in the process. The impact of these combined criteria is greater than what is currently found in any one individual national or regional tire regulation.

C. Status of the GTR for Light Vehicle Tires

Phase I, the development of the GTR for light vehicle tires is nearing completion. The GTR for light vehicle tires is expected to be on the agenda of the Executive Committee meeting during the World Forum for Harmonization of Vehicle Regulations (WP.29) meeting that will be held June 25 – 28, 2013. We believe the intent of the other contracting parties is to prepare the GTR on light vehicle tires for a confirmation vote at the next GRRF meeting, which is scheduled to be held on September 17 – 19, 2013.

Once the GTR for light vehicle tires is completed, work will begin on Phase II, the development of a GTR for light truck and commercial tires. Phase II is expected to be completed within two to three years.

D. Issues not Addressed by the GTR Process

While the GTR process under the 1998 Agreements offers a mechanism to harmonize many substantive technical regulatory requirements for automotive equipment, it does not provide a framework for harmonization of some key provisions. In particular, the GTR does not include administrative provisions for reciprocal recognition between contracting parties through a recognized globally accepted certification mark to substitute national certifications marks (marks such as "DOT," "E" –mark or "CCC"). Furthermore, reciprocal recognition of conformity of production and compliance testing should also be resolved through appropriate provisions.

II. TTIP Presents an Opportunity for Leadership

The TTIP offers an opportunity for the United States and the European Union to chart a new path forward. The U.S. and European tire industries encourage inclusion of reciprocal (mutual) recognition of automotive products, such as tires in the TTIP. Furthermore, we ask that the agreement create a framework to develop a common certification mark to indicate compliance with tire requirements specified in the GTR for tires.

Thank you for the opportunity to comment on this important trade negotiation. If any questions or a need for future information arise, please contact Tracey Norberg at 202-682-4839 or tnorberg@rma.org.

Respectfully,



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