



February 15, 2024

The Honorable Mike Johnson  
Speaker  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Charles Schumer  
Majority Leader  
U.S. Senate  
Washington, D.C. 20510

The Honorable Hakeem Jeffries  
Democratic Leader  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Mitch McConnell  
Minority Leader  
U.S. Senate  
Washington, D.C. 20510

**RE: USTMA Legislative Priorities for the Second Session of the 118<sup>th</sup> Congress**

Dear Speaker Johnson, Leader Schumer, Leader Jeffries and Leader McConnell:

With the second session of the 118<sup>th</sup> Congress underway, the U.S. Tire Manufacturers Association (USTMA) and our member companies continue our efforts to engage with you and your staff to advance road safety, tire innovation, environmental stewardship and manufacturing jobs in the U.S. We know our collaborative efforts help to support the American people and contribute to the safety of our roads and the health of our nation's economy.

As we shared in 2023, USTMA continues to prioritize six key policy areas that incentivize the expansion of advanced technologies and responsible infrastructure solutions:

- We urge **NHTSA action on long-awaited rules** for consumer tire information and performance standards and modernization of tire testing regulations to catalyze innovation;
- We support investment in the **expansion of sustainable and circular infrastructure solutions for scrap tires**, such as use in rubber modified asphalt (RMA) in infrastructure projects and research to assess the benefits of tire derived aggregate (TDA);
- We encourage Congress to support funding to identify mitigation solutions for **roadway runoff** to ensure stormwater is protected as a valuable resource;
- We support the **use and domestic manufacturing of retreaded tires** for commercial vehicles to enhance sustainability and grow American jobs;
- We encourage Congress to ensure **fair, equal and standardized access to digital vehicle data** and infrastructure assets; and
- We support federal funding to develop **domestic sources of sustainable natural rubber**.

**USTMA asks Congress to urge the National Highway Traffic Safety Administration (NHTSA) to move forward with long overdue rules on consumer tire information and standards. USTMA also welcomes Congressional support for NHTSA efforts to eliminate outdated Federal Motor Vehicle Safety Standards (FMVSS) tests and removal conditions, which are harming the global competitiveness of the U.S. tire manufacturing industry.**

***We ask Congress to urge NHTSA to swiftly comply with the directives under EISA and the FAST Act and establish national regulations for tire consumer information and standards.*** USTMA has long supported a singular, nationwide approach to tire information and standards. In 2007, our trade association worked closely with Congress on language in the Energy Independence and Security Act (EISA) that would establish a national tire fuel efficiency consumer information program to educate consumers about the effect of tires on automobile fuel efficiency, traction and durability. Our organization also engaged with Congress on the Fixing America's Surface Transportation (FAST) Act of 2015 to include the promulgation of regulations for tire fuel efficiency and wet traction minimum performance standards. However, after almost seventeen years since EISA was signed into law and nine years since the passage of the FAST Act, NHTSA has not acted on either of the Congressional mandates. In the absence of a federal framework set by NHTSA, states have begun to draft their own tire performance proposals that threaten to eliminate the vast majority of tires on the market today from being sold in-state in the future. The need for NHTSA leadership is significant in this area, with consumer choice and the availability of appropriate tires to meet consumer needs at stake.

***We call on Congress to urge NHTSA to modernize safety standards to allow for adoption of more innovative technologies, enhance the performance of tires available in the U.S. market and give U.S. consumers access to higher performing tires already available in other markets, including Europe.*** We advocate that NHTSA eliminate the bead unseating and plunger energy tests from the Federal Motor Vehicle Safety Standards (FMVSS). These tests were designed over 60 years ago for bias ply tires and do not deliver a safety benefit for today's modern radial tires. We also support the elimination of parasitic tread block chunking as a failure mode in the FMVSS 139 endurance test to remove barriers that currently keep innovative products with superior performance from entering the U.S. market. In a 2019 advanced notice of proposed rulemaking, NHTSA acknowledged the potential need to remove these tests from FMVSS, however it has yet to act further in the five years that have since elapsed.

***We support investment in the expansion of sustainable and circular market solutions for scrap tires, such as use of rubber modified asphalt (RMA) in infrastructure projects and research to assess the benefits of tire derived aggregate (TDA).***

Each year over 250 million scrap tires are generated in the U.S. While tires remain one of the most recycled products in the country, ensuring end-use markets continue to grow to consume annually generated scrap tires is essential to preventing tire stockpiles and illegal dumping. USTMA recognizes rubber modified asphalt and tire derived aggregate have the greatest potential for market growth given the historic investments made by the Bipartisan Infrastructure Law and the Investment Reduction Act.

***We urge Congress to identify rubber modified asphalt (RMA) as a preferred pavement material for federal projects and support funding for research to further study RMA use benefits, including supplementing preliminary findings of reductions in environmental impact when using RMA.***

RMA is a mixture of recycled ground tire rubber and asphalt that provides proven economic, environmental and performance benefits. RMA increases pavement service life and reduces road maintenance activities, leading to significant cost savings compared to traditional asphalt. It reduces CO<sub>2</sub> emissions by 32%, lowering energy consumption over the lifetime of pavement as compared to traditional asphalt. RMA also provides performance and safety benefits by increasing skid resistance, reducing tire wear, reducing road noise, and reducing road spray in wet conditions.

***USTMA urges Congress to fund research and demonstration projects using TDA in federal, state and local construction projects.*** TDA (large shreds of scrap tires) can be used as cost-effective infill material for roadside embankments, retaining walls and stormwater infiltration galleries. The use of TDA realizes significant benefits, including reducing costs compared to traditional mined construction materials and improved drainage in stormwater infiltration galleries. Studies show TDA use in infiltration galleries can reduce metals loading in stormwater. TDA used under railroad tracks also has proven effective and cost-efficient in mitigating ground vibrations from rail lines, a significant benefit to neighboring communities.

**USTMA urges Congress to support funding to identify, develop and expand the use of mitigation solutions for roadway runoff.**

Rain and snow melt causes contaminants from vehicles, road and highway construction and maintenance to be washed from roads directly into water bodies. To ensure stormwater is protected as a valuable resource, we encourage funding for research to identify, develop and expand the use of mitigation strategies and technologies to treat stormwater runoff from roadways. We also support the deployment of existing technologies that filter pollutants before they enter waterways, including the use of stormwater bioretention technologies, use of permeable pavements and increased street sweeping in urban areas. Rebuilding America's roadways should be done with the future in mind to increase driver safety and ensure reductions in environmental impacts, including mitigation for roadway runoff.

**USTMA promotes domestic manufacturing and the use of retreaded tires for commercial vehicles to enhance sustainability and grow American jobs.**

Commercial tire retreading provides a highly effective way to recycle tires with many additional notable economic and environmental benefits. In addition to job creation, retreading reduces energy consumption, CO<sub>2</sub> emissions, raw material usage and tire disposal challenges. Despite these advantages, retreading of commercial tires has steadily decreased over the last 25 years.

USTMA encourages Congress to provide financial incentives for domestic tire retreading. This could be accomplished through a per-tire manufacturing grant to tire retreaders or as a tax credit to purchasers of domestically retreaded tires. Congress has an opportunity to lead by example by requiring the purchase of domestically retreaded tires for the federal fleet and any fleet under federal contract, where possible, given precedent for such policies.

**We support federal funding to develop domestic sources of sustainable natural rubber**

***Since natural rubber is critical to the tire industry, national security and the U.S. economy, USTMA strongly supports efforts to promote the development of a domestic supply of natural rubber, including guayule and TKS (dandelion), which have led to successful experimental tires.*** Natural rubber is used in all tires and provides needed performance and durability qualities that can only be achieved through its use. For example, commercial and military aircraft tire treads and heavy-duty truck and bus tread are made almost completely from natural rubber because of unique properties that synthetic rubber does not offer. With 90% of natural rubber supply coming from southeast Asia, any supply chain interruptions may have serious repercussions for the U.S. tire market, potentially restricting production of truck, aircraft and military vehicles and aircraft tires.

We urge Congress to support the development of a domestic natural rubber industry to include:

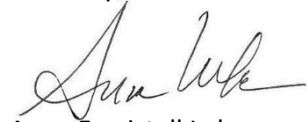
- 1) Economic support for farmers to incentivize needed investments to help them adapt to planting rubber-producing crops as part of the normal agricultural economy;
- 2) Economic support to scale commercial processing facilities to extract the rubber and other high-value co-products from guayule and TKS; and
- 3) Funding for research to further develop domestic sources of natural rubber.

**We support equal and standardized access to digital vehicle and infrastructure assets.**

***We urge Congress to support fair, equal and standardized access to digital vehicle and infrastructure assets, including real-time access to data and hardware resources to advance innovation of connected and autonomous technologies in the U.S.*** The future of mobility is changing rapidly with major innovations in advanced driver-assistance systems (ADAS), autonomous driving, vehicle electrification and vehicle-to-vehicle and vehicle-to-infrastructure connectivity. Information generated by the tire and paired with vehicle data can be leveraged to link information about the road and the vehicle to provide key information to the driver around fuel efficiency, tire maintenance and monitoring road and weather conditions.

U.S. tire manufacturers are a critical part of the American economy, with a commitment to sustainable practices in every aspect of their businesses. As global leaders in manufacturing, our companies embrace a shared responsibility of helping to achieve a more sustainable society. We look forward to continuing our work together. For more information, please contact Nicholas Scoufaras, USTMA's Associate Director of Government Affairs, at (202) 682-4853 or [nscoufaras@ustires.org](mailto:nscoufaras@ustires.org).

Sincerely,



Anne Forristall Luke

President and CEO

U.S. Tire Manufacturers Association

cc: The Honorable Joseph R. Biden, President of the United States  
The Honorable Pete Buttigieg, Secretary, U.S. Department of Transportation  
The Honorable Robin Carnahan, Administrator, U.S. General Services Administration  
The Honorable Ali Zaidi, White House National Climate Advisor  
The Honorable Gina Raimondo, Secretary, U.S. Department of Commerce  
The Honorable Michael Regan, Administrator, U.S. Environmental Protection Agency  
Members, U.S. Senate  
Members, U.S. House of Representatives