

March 2, 2026

Testimony from:

Tire Industry Association (TIA)

in Opposition to H.B. 7990

Submitted to:

House State Government and Elections Committee

Rhode Island General Assembly

Dear, Chair Shanley, First Vice Chair Messier, Second Vice Chair Corvese, and members of the House State Government and Elections Committee,

The Tire Industry Association (TIA) is submitting these comments on behalf of its members in the state of Rhode Island in opposition to House Bill 7990.

The Tire Industry Association is an international non-profit association representing all segments of the tire industry, including companies that manufacture, repair, recycle, sell, service or use new or retreaded tires, and also those suppliers or individuals who furnish equipment, material or services to the industry.

The mission of TIA is to promote tire safety through training and education, to act as the principal advocate in government affairs and to enhance the image and professionalism of the industry so that our member businesses may be more successful. TIA has more than 13,000 members from all 50 states and around the globe. TIA has 26 members in the state of Rhode Island.

The Tire Fuel Efficiency Consumer Information Program (575.106) was first published in 2010 and (e)(1)(iii) which outlines the date for compliance states the requirements will be indicated in a forthcoming final rule. Almost 16 years later, the compliance dates have still not been published and the current NHTSA website still lists the UTQG ratings of Treadwear, Traction and Temperature. Wet grip ratings already exist with the UTQG Traction ratings of AA, A, B and C as outlined by 575.104. The new tire manufacturers are already required to test all tires for traction when braking on wet concrete and asphalt. While 575.106 does outline requirements for a fuel efficiency rating, tire manufacturers have still not published fuel efficiency ratings for passenger and light truck tires. Without these ratings, there is no way for retailers or consumers to determine if a replacement tire is more or less energy efficient than an original equipment tire.



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Based on information from the leading tire manufacturers, the benefits of fuel-efficient tires will save between 1-4% in fuel consumption. The amount of savings is still dependent on basic maintenance like inflation pressure, alignment and regular rotation. Fuel-efficient tires are often 5-10% more expensive when compared to standard all-season tires from the same manufacturer, but the price difference between Tier 1 name-brand manufacturers and Tier 3-4 economy tires from off-shore manufacturers can be as much as \$100 per tire or more. Since replacement tires will be more expensive, motorists will either put off purchasing new tires and operate their vehicles with lower tread depths or they will turn to the used tire market where restrictions do not apply. Requiring fuel-efficient tires for all consumers will directly affect lower socio-economic classes who rely on economy tires and severely limit consumer choice.

According to 2023 Federal Highway Administration statistics, Rhode Island is number 43 in private and commercial automobile registrations with 317,150. There are 30 states with 1 million or more registrations so tire manufacturers will be more willing to suspend sales in the state of Rhode Island if they are forced to comply with this legislation. California is the only other state currently considering similar legislation, but they have 13,189,308 registrations making it a significantly larger market. Since the tire manufacturers have not supplied rolling resistance data to California, the state has created their own data at considerable expense to taxpayers. As it stands today, California's approach is to create list of approved tires that can be sold to the public without any specific ratings.

The geographic location of Rhode Island makes it much easier for motorists to travel to a neighboring state to purchase replacement tires if fuel-efficient models are mandated. There are border areas of California where this situation exists, but the majority of the population is hours away from a neighboring state. The majority of the population in the state of Rhode Island is in the Providence area, which has a very short drive to Massachusetts. Tire retailers in Rhode Island will definitely suffer from this legislation as consumers can easily travel to a neighboring state to purchase lower cost replacement tires if this legislation is enacted. Again, the lower socio-economic classes will be the most negatively affected since the additional tire replacement costs will be detrimental to motorists who are not concerned with fuel economy. Those consumers who currently purchase new Tier 3 and Tier 4 economy brands from off-shore manufacturers to save money will either travel to a neighboring state, run their tires to lower tread depths, or turn to the used tire market when they are in need of replacement tires.

This legislation will not benefit consumers. Besides higher tire prices, the savings in fuel costs would be minimal. The US Department of Energy website [www.fueleconomy.gov](http://www.fueleconomy.gov) demonstrates the minimal savings in fuel costs that a vehicle with fuel-efficient tires will experience. If a vehicle is well-maintained and operated with tires that are properly inflated and averages 22.2 miles-per-gallon, a 2% reduction in fuel mileage from standard all-season tires would be approximately 21.8 miles per gallon. If the vehicle drives 12,000 miles per year and averages



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55% city driving, the motorist can expect to get 4 years out of a set of fuel-efficient tires if the tires and vehicle are properly maintained. In this best case scenario, the consumer would save \$29 annually or \$116 over the life of the tires, which is \$29 per tire. Considering that 48,000 miles is best case, a more realistic savings of \$87 would be realized if the motorist gets 36,000 miles out of the fuel-efficient tires, which is approximately \$22 per tire.

TIA is continuing to gather data on this topic and will provide additional information to the Committee when appropriate.

Please do not hesitate to contact TIA for further information and feedback from our members.

We appreciate the opportunity to comment.

Sincerely,

Richard "Dick" Gust  
CEO  
Tire Industry Association

Kevin Rohlwing  
Chief Technical Officer  
Tire Industry Association

Roy Littlefield IV  
Vice President of Government Affairs  
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