



Testimony of the
U.S. TIRE MANUFACTURERS ASSOCIATION
in Opposition to
HOUSE BILL 7990
submitted to the
HOUSE STATE GOVERNMENT AND ELECTIONS COMMITTEE
RHODE ISLAND GENERAL ASSEMBLY
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Good afternoon, Chair Shanley, First Vice Chair Messier, Second Vice Chair Corvese, and distinguished members of the House State Government and Elections Committee, my name is Sean Moore, and I am submitting this testimony on behalf of the U.S. Tire Manufacturers Association (USTMA)¹ **in opposition to House Bill 7990.**

USTMA is the national trade association for tire manufacturers that produce tires in the United States. Ten of our member companies operate 41 tire-related manufacturing facilities across 16 states. The U.S. tire manufacturing industry directly supports more than 400 Rhode Island jobs and indirectly supports more than 670 additional jobs across the state. In Rhode Island, tire manufacturing produces a direct economic impact of more than \$101 million per year and generates more than \$15 million annually in state and local tax revenue. USTMA advances a sustainable tire manufacturing industry through thought leadership and a commitment to science-based public policy advocacy.

Tires play a vital role in the safety and performance of consumer vehicles.

USTMA recognizes that tires contribute to vehicle fuel economy and can positively contribute to the reduction of greenhouse gas emissions in a comprehensive climate change strategy. Our members embrace the opportunity to develop new innovative technologies to enhance tire and vehicle safety, performance, and reliability. USTMA further recognizes the importance of ensuring that other critical tire performance characteristics, including wet traction, are maintained at acceptable levels as tire efficiency is improved.

USTMA strongly supports a common, consistent North American approach to consumer information and minimum performance standards in the U.S. and Canada, since both countries have similar products and regulatory requirements. This approach would maximize impact and effectiveness, minimize costs associated with implementation and provide clear, consistent messages to consumers.

¹ Bridgestone Americas, Inc., Continental Tire the Americas, LLC, GITI Tire (USA), The Goodyear Tire & Rubber Company, Hankook Tire America Corp., Kumho Tire U.S.A., Inc., Nokian Tyres Inc., Pirelli Tire North America, Inc., Toyo Tire Holdings of Americas Inc., and Yokohama Tire Corporation support federal implementation of a consumer information program with performance standards for tires. Michelin North America dissents from the USTMA position on that issue.

USTMA supports national regulations on tire consumer information and minimum performance standards for rolling resistance and wet grip.

USTMA supports developing national regulations to mandate tire consumer information at point-of-sale. Tire consumer ratings should/should be:

- Useful to consumers;
- Give consumers meaningful choices for their vehicles;
- Create rating bins that are at least as wide as long-term seasonal and lab variability of the test method, with a further awareness of manufacturing variability;
- Allow for adequate compliance assurance and flexibility;
- Allow for future product improvement and differentiation; and
- Communicated clearly to consumers.

USTMA supports providing tire consumer information and ratings to consumers on the Internet and at point of sale. We oppose any requirement that would mandate ratings to be marked on the tire sidewall or provided on a sticker attached to a new tire, since a typical consumer does not see either a tire sidewall or a sticker on a tire prior to making a tire purchase decision.

USTMA supports setting minimum federal performance standards for tire efficiency (rolling resistance) and wet traction (wet braking). USTMA recognizes the role of setting minimum standards for tire efficiency in a comprehensive climate strategy. To ensure that wet traction is not compromised by setting tire efficiency standards, wet traction minimum standards must accompany tire efficiency standards.

Federal law mandates regulations on tire consumer information and standards.

Congress directed the National Highway Traffic Safety Administration (NHTSA) to develop regulations on tire consumer information at point of sale in the Energy Independence and Security Act (EISA) and minimum performance standards for tire efficiency and wet traction in the Fixing America's Surface Transportation Act ("FAST Act"). NHTSA has not yet finalized regulations on tire consumer information or standards.

We encourage Rhode Island officials to engage with federal policymakers as these rulemakings progress. Further, we welcome opportunities to coordinate with Rhode Island legislators and the state's federal delegation to advance this important national program.

Conclusion

We appreciate your time and consideration of our concerns with this bill, and we welcome the opportunity to be a part of this discussion moving forward. We respectfully encourage the committee to recommend **HB 7990 be held for further study**.

Please contact me at smoore@ustires.org or 202-682-4861 if you have any questions related to our position.