

**Remarks prepared for
David Strickland, Administrator
National Highway Traffic Safety Administration**

**Rubber Manufacturers Association
Annual Meeting
Washington, DC
April 30, 2010**

**Thank you, Dan, for the invitation to be here. Dan and I go
way back, to my previous life. He knows what I'm about.
I'm sure you are all wondering about me and about what
you can expect from NHTSA.**

My answer to that is I expect NHTSA to be an active Agency. I believe in NHTSA's consumer protection mission. When the President asked me to take the wheel at NHTSA, he knew I'd already worked closely with all major aspects of the industry.

And the industry is facing some fairly complex issues. Rising fuel prices, energy independence, climate change and environment concern, the wireless world...all of these issues touch the auto industry in some way.

But honestly, what has taken up the bulk of my time at NHTSA since I got there is Toyota. I knew going in that the stuff for Toyota was going to be prevalent, but I had no idea how intense it was really going to be. You've all seen the press coverage, the hearings on the Hill.

As you've probably seen in the news in just the last couple of days, there's even legislation to be introduced that deals with some of the issues—for example, requiring brake over-ride systems in all passenger vehicles.

We will do our job with an open mind and careful, scientific methods. We've also started two re-search efforts to address the issue of unintended acceleration. The National Academy of Sciences – a respected independent body using top scientific experts – will examine the broad subject of unintended acceleration and electronic vehicle controls across the entire automotive industry.

Separately, we've enlisted NASA scientists with expertise in areas such as computer controlled electronic systems, electromagnetic interference, and software integrity to help tackle the issue of unintended vehicle acceleration in Toyotas. NASA's review will be comprehensive and will assist us in determining whether Toyota vehicles contain any flaws that would warrant a defect investigation.

NHTSA's review will also be comprehensive. Can we extrapolate lessons from the Toyota situation to other areas that NHTSA governs? Of course.

A good place to start is the speed of our recall investigations. I believe they can and should be faster. The recall form should be simplified. We will not lose sight of the due process right of automakers, but we need to shorten the length of time drivers are exposed to risk if there is a problem with a vehicle.

In turn, I expect automakers to deal with us honestly, thoroughly, and in a timely manner.

So, in the spirit of being timely, and thorough, I want to touch on some of the issues that I'm sure you want to hear about. I'll start with our ongoing work in tire fuel efficiency ratings.

We just published the final rule specifying the test procedures for rating the performance of replacement passenger car tires for a new consumer information and education program on fuel efficiency, safety and durability.

To fully establish this new consumer program, we need to take two more steps.

First, we must still specify the method manufacturers will use to address lab-to-lab variability for the fuel efficiency test. We want a method that can be used, including specification of a reference laboratory or laboratories and reference tires.

The second thing we need to do is finalize exactly what information should be on the label so that the consumer understands the label.

NHTSA held a public meeting last month to gather comments on a consumer research plan. We received a number of suggestions that we are evaluating and using to help develop a draft research plan.

Once the draft research plan is developed, the public will have further opportunity to comment on the plan during the PRA clearance process.

If the plan is approved quickly, the research can be conducted this summer. We could have a proposal for the consumer information label published by the end of the year.

As to the heavy truck tire upgrade—FMVSS 119 went into effect in 1973 and has not been significantly updated since then. Heavy truck tires on the market today perform far and above the requirements of FMVSS 119.

We've been conducting extensive testing to determine what the new performance requirements should be. And, you have been providing us test data on tires that we tested and on tires we were not able to test.

Based on the test results we have accumulated to date we have decided to propose an upgrade that would include an upgraded Endurance test and a new High Speed test. We plan to finalize our work on a proposal that would update the standard later this year.

And on the subject of heavy vehicle tires, it seems you can't discuss commercial vehicle tires without mentioning retreads. The agency routinely responds to the public perception that every "road alligator" on the highway is result of a retreaded tire that has failed.

While there have been several studies on this topic, we can all agree that the steps we are taking to improve the performance requirements for heavy truck tires will improve the overall tire performance of new and retreaded tires since it will enhance the robustness of the casings developed for new tires and used to build retreaded tires.

And lastly, I know there has been a lot of discussion about the establishment of an Aging Test for Light Vehicle Tires. I know some of your members don't feel there is a need for an aging test. I believe there is

Our research has found that artificially aging a tire in a laboratory oven is a scientifically valid method to accelerate the tire aging process and to simulate a naturally aged tire in service on a vehicle.

Further, research has shown that testing an artificially aged tire at specified laboratory conditions of speed, load, inflation pressure, and duration, may be a valid method to predict a tire's performance in the field.

Based on these test results and the benefits we have mined from our existing data sets, we are developing a proposal for new oven-ageing requirements for tires used on light vehicles.

As I said at the beginning, I believe in NHTSA's consumer protection mission. To fulfill that mission, I expect us to be active and pro-active. And I believe we are putting the right framework in place to strengthen our Nation and our industry. Thank you.