**Appendix F:**

**Tire Fuel Efficiency Consumer Information Program**

**Consumer Research Public Meeting**

**Friday March 26, 2010**

**Docket No. NHTSA-2010-0018**

Below is a bulleted summary of the remarks made by speakers at the public meeting.

* Stephen R. Kratzke (NHTSA) - Opening Remarks
	+ Congress required the TFE rule.
	+ After NHTSA published the NPRM we received unfavorable comments. We need to understand consumer comprehension of the labels and information formats.Further consumer research. We need to reach out to public for ideas and questions about how to conduct that research.
	+ Look at detailed research plan online.
	+ Meeting is for us to get your help/thoughts as we develop the new consumer research for the label. How can we present this information most effectively? How can we make it meaningful to people who are going to see it?
	+ We have a tight timeframe.
	+ Final consumer research report in September 2010.
	+ Panel who is assisting with this effort:
		- Dr. Jordan Lin (FDA) – his group applies social science techniques to provide advice on product labeling.
		- Kristin Kenausis (EPA) works in EPA’s office of transportation and air quality where she helped develop and launch consumer campaign for SmartWay certified vehicles program.
		- Dr. Lisandra Garay-Vega (Volpe) – phD in engineering emphasis in human factors. Expertise in experimental design, transportation safety.
		- Kil-Jae Hong (NHTSA) – marketing specialist in OCCI – managing the development of the consumer information program for the agency.
		- Mary Versailles (NHTSA rulemaking) – leading tire fuel efficiency team.
	+ We’re serious about making this a model for how NHTSA can make this a consumer information program that’s based on good science and accomplishes what Congress asked us to do.
* Dr. Roy Littlefield (TIA)
	+ A label is not enough – consumer rarely sees tires before purchase. And tires are not all on display. Unless the displayed tire is the same size consumer buying then information will not be right. For comparative purposes tire retails has to transfer tires from warehouse to show room. Making same label information available in easily accessible electronic format and a NHTSA catalog would be far more effective, with a trained sales associate, than a label.
	+ Genesis of this entire rulemaking is to reduce GHG emissions from the fleet. Focus on improper tire inflation and maintenance. NAS report noted this.
	+ NHTSA’s research is not relevant for how consumers comprehend information and make decisions following a tire blowout. Internet survey favors education and wealth.
	+ It is critical to collect data following a purchase. To develop a comprehensive understanding of tire purchases, NHTSA needs to collect at least 1000 responses from multiple geographic reasons at the point of sale.
		- Cost prohibitive?
		- Respondents will not talk about a speculative situation – they will talk about a decision they just made.
		- TIA can do this. Scanable questionnaire – retailers should be asked to encourage consumers to fill out form.
* Dan Zielinski (RMA)
	+ Members were very involved in legislative passage of this provision of EISA.
	+ Legislation centered on 4 principles:
		- Point of sale.
		- Easy to understand.
		- Meaningful rating system.
		- Cost effective rule.
	+ RMA submitted comprehensive consumer research to NPRM. Methodology was similar to NHTSA focus group. Tested modified versions of NHTSA’s focus group labels.
		- Five different formats,
		- Took findings of NHTSA and tested it,
		- Changed star format to be more like NCAP.
		- Star format scored highest.
		- 0-100 scale label’s precision does not exist. When told this, consumers prefer something different be used.
	+ Paper label is impractical and ineffective for consumer information. Info should be provided by internet and at point of sale by trained technicians.
	+ Other forms of information: manufacturer brochures, product catalogs.
	+ 0-100 scale is not practical.
		- Misleading level of precision. Tires within 10-20 points not likely to have significantly different performance.
		- RRF will group/cluster sizes of tires at different parts of the scales (larger truck tires all at bottom – not likely to influence purchase; smaller tires at top).
		- Consumes don’t make vehicle purchase based on tire fuel efficiency.
		- Rating system should be a means to rate tires, not a means to rate vehicles.
		- NHTSA should mandate poster.
	+ Research plan concerns:
		- NHTSA’s most recent consumer testing used only 2 label formats. More formats need to be tested.
		- Internet rating formats/point of sale rating formats should be tested for whether they are understandable to consumers.
		- Should the testing have a benchmark rating format? The UTQGS symbols perhaps? As a reference to show whether the alternatives are better than the current rating design? Would show how much (if at all) better the new formats are.
		- Monadic design – recommend testing one design variable at a time, within any one system of a label – to prevent any bias.
		- Rate beyond comprehension. Quantitative research. Likelihood that people will take the time to read them/notice them should be tested.
		- Participant eligibility: specific for purchasing responsibility. Person in charge of making decisions re: vehicle repair, may not be person purchasing tires.
	+ Process Concerns
		- How will stakeholders be able to comment on format recommendations?
		- NHTSA schedule (p. 6 of posted research plan) – does not include milestone to consider and incorporate public meeting comments.
	+ Consumers want to compare preferred traits suitable for their vehicle, which = RRC.
* Walter Waddell (Exxon Mobil Chemical)
	+ Tires need to be at an optimal pressure. They lose pressure at different rates. Consumers should be aware of these loss rates.
	+ Technical presentation about the importance of differing IPR loss rates.
* Mary Versailles (NHTSA) - Next Steps
	+ Mary explained process for development of consumer research plan, including the fact that there would be a chance to comment once more on the revised plan via a collection of information request notice issued by OMB).