



Safety Research & Strategies, Inc.

340 Anawan Street / Suite 200
Rehoboth, MA 02769
Ph. 508-252-2333, Fax 508-252-3137
www.safetyresearch.net

May 25, 2005

Frederick L. Webber, President
Alliance of Automobile Manufacturers
1401 Eye Street, N.W., Suite 900
Washington, DC 20005

RE: Tire Aging

Dear Mr. Webber:

I am writing to commend Alliance members for their position on tire age degradation and their willingness to alert consumers of this little-known problem. I am also writing to urge the Alliance to support a NHTSA-issued tire aging Consumer Advisory.

As you may know Alliance members Ford Motor Company and DaimlerChrysler have recently announced plans to begin advising vehicle owners to replace their tires after six years, regardless of mileage. Other Alliance members have already taken a leadership role in this area. BMW, Toyota and Volkswagen, have provided similar warnings since 1990. Owner's manuals from General Motors European brands also contain tire age degradation warnings.

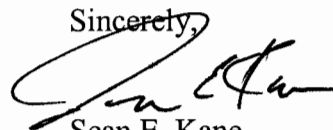
In a November 5, 2004 submission to (Docket 15400) we requested NHTSA issue a "Consumer Advisory" alerting the public to the dangers of aged tires. Our request is based on our review of cases in which "aged" tires (tires older than 6 years) have failed catastrophically causing crashes and subsequent death and injury. We are providing additional information to NHTSA on 70 crashes that have resulted in 52 fatalities and more than 50 serious injuries (Docket 21276). A common thread among these cases is the fact that the failed tires appeared to be serviceable (i.e., they have ample tread and no outward signs of degradation). Many of these cases involved spare tires with little or no use, used tires, or tires that have been stored for long periods of time. Often aged tires are installed by tire or vehicle dealers who are unaware of potential dangers. The issuance of an advisory about the increased risks associated with aged tires could have a significant effect toward reducing failures and subsequent crashes

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as it would likely become a guideline for tire dealers and technicians who routinely advise consumers about tire safety.

Now that a majority of Alliance members provide guidelines on tire aging, we are asking that the Alliance support a NHTSA Consumer Advisory as a method to increase the effectiveness of members' recommendations and to reach a much wider audience than those who are able to find the tire age section of a web page or owner's manual.

Sincerely,



Sean E. Kane