



March 6, 2023

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: Replacement Tire Efficiency regulations**

On behalf of the California Autobody Association (CAA), we are writing to provide comments to the California Energy Commission proposed Replacement Tire Efficiency regulations. The CAA is a non-profit automotive trade association comprised of approximately 1,000 individual and independent repair businesses within the collision repair industry.

Auto body and collision repair facilities are automotive repair dealers who perform repairs or reconstruction of automobile or truck bodies, structures or frames. While performing such collision repairs it maybe necessary replace a damaged wheel and tire as part of the repair.

The auto body repair business is not in the primary business of selling tires to the general public but will locate a replacement tire to match the damaged tire as part of the collision repair. Consumers do not go to auto body shops to buy a set of new set of replacement tires. Consumers go to auto body repair facilities because of a vehicle accident and wish to have collision damage repaired. The auto body dealer is not a "tire dealer" or "tire retailer" as contemplated by these regulations. It would be unreasonable to expect an auto body repair shop to meet the proposed regulation requirements.

As such, we respectfully request that auto body repair facilities be exempted from these regulations or alternatively, revise the definition of tire dealer to focus on automotive repair dealers that primarily sell tires to consumers.

Thank you for your consideration.

Sincerely,

Rick Johnson  
Executive Director

A handwritten signature in blue ink, appearing to read 'Rick Johnson', is written below the typed name and title.