



North Carolina Pupil Transportation Association

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The North Carolina Pupil Transportation Association (NCPTA) represents 1200 professional members throughout the state who are dedicated to the safe and efficient transportation of our public school students. This group is comprised of technicians, office professionals, and administrative staff.

Legislation has been drafted that will affect the procurement of retread tires for school buses. The draft legislation (BILL DRAFT 2011-RWz-15 [v.3]) effectively eliminates the current retread rubber formulation requirement and specifies that pre-cure retread tires be certified as fuel efficient by the retread manufacturer. Proposed changes would go into effect on July 1, 2012.

NCPTA's position on these two items is provided below:

1} **Elimination of the current retread rubber formulation** – The current requirement to meet a specific retread rubber formulation does not appear to add value or ensure safety of retread tires used on school buses. All school bus tires are inspected every 30 days as part of a rigorous school bus inspections program. During the inspection, tires are checked for tread depth, signs of damage or unusual wear, and a stop test is performed on the school bus to ensure the brakes and tires are operating in a safe manner. It is imperative that the rubber formulation or lack thereof not adversely affect tire performance or safety. Removal of the rubber formulation requirement effectively will increase competition among vendors to provide safe, fuel efficient and economical retread tires. ***NCPTA supports the removal of the current retread rubber formulation requirement.***

2} **Requirement for Pre-Cure Retread Tires to be Certified as Fuel Efficient** – With the need to operate efficiently high on every agencies list of priorities, it seems intuitive to support the requirement to have pre-cure retread tires certified as fuel efficient. The concern with this requirement is defining how retread tire manufacturers will meet the fuel efficient standard. Our desire is to be able to purchase safe and economical retread tires for use on school buses. Competition among vendors is the best way to ensure that both of these goals are met. We would not support legislation that would limit competition to only a few vendors. Thus, it appears that this portion of the proposed legislation needs further study so as to ensure all retread manufacturers are able to compete to supply safe and economical retread tires. ***Our recommendation is to strike this requirement from the legislation until further study can prove the benefits of including such a requirement to the state of North Carolina.***