highway speeds. Unless rear traction dominance is maintained on this type of vehicle, there is a high risk of loss of lateral stability resulting from an "Oversteer" condition during evasive or corrective actions on low traction surfaces. This can be overcome in vehicles equipped with Electronic Stability Control systems. The vehicles in question are not so equipped, and a loss of vehicle stability due to "Oversteer" presents an extremely dangerous situation and has been documented to produce serious and often fatal results.

Where this condition is recognized, it must be addressed before adopting the general and all encompassing recommendations from Transport Canada.

As you are aware, our requests to Transport Canada have resulted in a maintaining of their position, despite our identification of this area of concern, and requests for assistance. The concerns have not been addressed and replies include references to general documentation that does not address our areas of concern, personal opinions, and anecdotal references to input from various sources.

There has been an indication of the understanding of our concern from various references as forwarded to us by [redacted]

Rubber Manufacturers Association / Replacement Guidelines for Passenger and Light Truck Tires:

> " If winter/snow tires are installed on the rear axle of any vehicle, it is recommended (but not required) that they also be installed on the front axle".
>
> "Placing greater traction on the rear axle on wet surfaces is necessary to prevent a possible oversteer condition and loss of vehicle stability."

Bridgestone Tire:

> " If winter/snow tires are installed on the rear axle of any vehicle, it is recommended, but not required, that they also be installed on the front axle".
>
> "In winter driving conditions, vehicle control and safe operation under braking and cornering is especially dependent upon the rear tires. For this reason, winter tires are best applied to all