question is that of rear end skidding, or "oversteer". This situation is identifiable and can present on perfectly straight sections of highway within legal posted speeds. Vehicle operators can drive vehicles with appropriate caution and procedures to address normal steering, stopping, and braking situations when dealing with normal intersection and turning situations. The sudden loss of lateral control risk is difficult to anticipate and address. This is an identifiable concern and numerous incidents occur on public highways each year that cause serious injuries and/ or loss of life. These incidents arise from loss of vehicle control or "oversteer" situations in both wet highways in warmer seasons and snow and ice conditions in winter.

Front wheel drive vehicles have historically been more prone to such situations, and manufacturers of vehicles, vehicle systems, and tire manufacturers have introduced significant developments including, Anti Lock brakes, Electronic Stability Control systems, and appropriate rain and winter adaptive tires for this common end. The objective is to allow the operator to maintain vehicle directional control in adverse conditions, in particular to prevent or limit "oversteer" in corrective actions.

Rear drive vehicles have an inherent tendency to resist the "oversteer" tendency common to front wheel drive vehicles, and can be helped to maintain this characteristic by ensuring rear traction dominance. In low traction conditions, high traction tires on steer positions can, in evasive and correctional actions, risk excessive front end braking or steering forces that can cause excessive vehicle rotation that can induce excessive rear tire slip angles and rapid loss of directional control.

We would agree that "steer" position and "drive" position winter designated tires that certain manufacturers market in Europe would be ideal and suitable for winter conditions. However as in heavy truck tires the same "drive" traction tires on all positions does not appear to be recommended for reasons of reducing the rear traction dominance for low traction winter conditions.

We agree that Winter designated tires for all positions will produce improvements at lower identified speeds, however with the identifiable risk of control loss during highway evasive or corrective actions, we will not be changing our recommendation for winter tire usage on the drive only positions to maintain rear traction dominance. These vehicles in question that are operated under control of the Department