situation braking, evasive steering action, or even by slush patches or black ice conditions. We concur with TC's published procedures for skid control, however including reaction time and completing the recommended procedures, several seconds can elapse with the vehicle travelling several hundred meters. This is in fact if the driver can actually regain control. The risk as you are aware is for the resulting possible intrusion into the oncoming lane of traffic on two lane highways, or leaving the road. Both of these situations are identifiable and occur at undesirable frequencies with often serious consequences.

Antilock brakes, Electronic stability control systems, and the usage of winter tires are all intended to assist in maintaining directional control of vehicles on the highway. It is our opinion and that of the majority of contacts we have, that backing off the accelerator on a rear wheel drive vehicle will induce a slight retarding action at the rear axle, and as such to assist in regaining vehicle stability. Under such circumstances the situation will be improved with rear traction dominance.

During our conference call yesterday [redacted] trongly disagreed with this, and stated "Where winter tires are available they should to be used on all positions." When asked he indicated this is based on "Years of testing, TC's documentation and documentation from The Rubber Association." We were not able to access any such documentation, notably for rearwheel drive vehicles." May we have the pertinent testing results and specific documentation supplied or identified for us, to allow us to evaluate our position? Again Public Safety is paramount.

There is another area of concern that arose from the telephone conversation. This concern is for all commercial and heavy vehicles, the majority of which are rearwheel drive. Although heavy truck tires do not fall in the specific class of "Designated Winter Tires", each of the manufacturers identified as producing "Winter Tires" and heavy truck tires, all have tires listed as suitable for snow conditions, similarly based on decades of design, testing, and usage with appropriate tread configurations. They all designate these as suitable for "drive positions", with other rib styles designated as "steering" or "trailer". If the recommendation by TC and the Rubber association is for MFABs to be equipped with "snow tires on all positions", similarly "Snow Condition Traction Tires" should be used on all heavy trucks, intercity busses, tractor trailers, utility vehicles, etc. based on the same facts, observations and conclusions.

Has Transport Canada started a program to advise these users of the all position requirement recommendations? . None of the fleets, utilities, or government fleet operators we are in contact with is aware if any such action.It is presently unclear how the MFABs might be considered and not school busses and intercity busses also as a minimum. Passenger safety considerations you will agree are of equally of concern in each case.

We thank you for your assistance in helping us clarify our position.

[redacted].

Looking for the perfect gift? **Give the gift of Flickr!**

Make your browsing faster, safer, and easier with the new Internet Explorer® 8. Optimized for Yahoo! **Get it Now for Free!**