Let me assure you that Transport Canada's mandate is to protect the health and safety of the public. This is why for almost 30 years both Transport Canada and the Tire Industry as represented by the Rubber Association of Canada have been informing the public to put identical tires on all wheel positions. In winter conditions, this means that winter tires should be fitted at all wheel positions for vehicles such as those described in your letter.

As you are aware we had communicated with several tire companies for their opinions on the matter of winter tire usage. Additionally, we communicated with Ford Motor Company, the manufacturer of the cab and chassis of some MFAVs. There is broad agreement that it is advantageous to have winter tires at all wheel positions, for the varied driving duty that is expected of all motor vehicles.

It should be noted that vehicle manufacturers, including chassis manufacturers, design the handling characteristics of their vehicles around identical tires at all wheel positions. Transport Canada's understanding is that the subject N.B. vehicles have four rear wheels and two front wheels. As such, their natural handling characteristic will be to understeer due to the tire to roadway contact patch dissimilarity between front and rear. The handling characteristics will vary depending on the location and mass of the passengers and luggage being transported but will generally be a varying amount of understeer, rather than oversteer.

Increasing understeer in winter conditions by means of rib front tires could further hinder the steerability and therefore controllability of the vehicle. Additionally, their use will increase the stopping distance in snow, ice, and slush.

We have been informed that many ambulance fleets from coast to coast (including in N.B.) use winter tires at all six wheel positions to enhance handling and braking. It should also be noted that ambulances operate under all types of road conditions, and often at very high speed. Ambulances are built on vehicle chassis similar to those used for MFAV's.

Transport Canada takes the safety of the travelling public very seriously. The transportation of students is of particular importance and has led to the development of specific safety standards for school buses and for other buses that are employed as Multi-Function Activity Vehicles. These buses have an exemplary record in protecting their occupants. Transport Canada believes that the use of winter tires in all positions on light-duty vehicles further enhances their safety. This opinion has also been widely echoed by the tire industry. The only area that seems to generate some variety of opinion is the stability of MFAVs at highway speed when equipped with winter tires vs. other tires, on the front axle.

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