

Sample Report Tires Supply Data Verification May 2024

### Purpose

This report provides a sample Verification Report for Tires supply data. This sample report is for reference only.

## Background

Under the <u>Tires</u> Regulations, TIRES producers ("producers") are required to report supply data each year (weight of obligated Tires supplied in Ontario two years prior) in order to establish their management requirement for the following year. Beginning in 2024, **all registered tires producers are expected to verify their supply data** by submitting a Verification Report to RPRA using the steps outlined in the <u>Registry Procedure – Audit (Appendix A – Tire Supply Data Verification)</u>. The supply data is expected to be verified by a Verifier as defined in the Registry Procedure.

The Verification Report must include the following:

- 1) The qualifications of the Verifier,
- 2) The reported weight of tires, and
- 3) The results of applying the specific verification steps to validate the reported units and weight.

This report provides a sample of the minimum requirements for verification which is intended for reference only. The Verifier is responsible for following the <u>Registry Procedure – Audit</u>.

There is no prescribed format for the Verification Report. The Verifier can adjust the headings and add additional information as needed. RPRA will review each Verification Report individually to determine its adequacy.

## How to Submit the Report

The Verification Report must be uploaded after a producer completes supply data reporting. The Verification Reports are accepted in PDF format.

### Templates

#### Template for Verifier who is an external practitioner

Tires producers who engage an external practitioner to complete their verification will meet the reporting requirement if the external practitioner provides a report in accordance with CSRS 4400, Agreed-upon procedures engagements.

RPRA will not issue a report template for an external practitioner, as the practitioner will follow CPA professional standards and the firm's practice, and the <u>Registry Procedure - Audit</u>

#### Template for Verifier who is an internal employee

Tires producers who decide to have an internal Verifier complete this verification can follow the sample template in <u>Appendix A</u>.

Have a question?

If a producer or Verifier has questions about the Verification Report, contact the Compliance and Registry Team at registry@rpra.ca or call **1-833-600-0530** for support.

# Appendix A – Sample report for internal Verifier – <u>Large producers that are tire manufacturers or</u> <u>tire wholesalers</u>.

Date Address

Dear RPRA,

As a [describe the verifier's qualifications], I, [complete name of the verifier] am a Qualified Person as defined in the RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u>, I have performed the following procedures using RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u> to assist [name of producer – referred to as Company X in rest of template] in the preparation of the Tires supply reporting to meet the verification requirement.

- [weight] kgs of [tires] Company X supplied in [Year]
- [units] of [tires] Company X supplied in [Year]

Registry Procedure:	Findings [Findings must be adapted to the particular facts of your company. Also, sample findings below refer only to tires. If you are reporting on other materials, you must also include separate verification procedures and findings for those materials (if applicable).]
<ol> <li>Document responses for the following questions:         <ul> <li>What is the producer's tire marketing process, including how products are supplied in Ontario (e.g., phone sales, ecommerce, retail sales, etc.)?</li> <li>How are products marketed/supplied in Ontario tracked separately from products supplied in other provinces?</li> <li>How is a SKU (Stock Keeping Unit) set up in the producer's ERP/database/system, and what product specifications are included (e.g., product weight, type, size, product description, brand name, etc.)?</li> <li>What are the locations of the producer's tire retail locations and warehouses in Ontario?</li> <li>What are the producer's obligations based on the definition of a producer? (Refer to Ontario Regulation 225/18: Tires.)</li> <li>What are the brand names of products for which the producer has collection and resource recovery obligations?</li> <li>What is the producer's methodology for determining how the products were supplied or marketed in Ontario ((refer to the definition of "market" in s. 59 of the Resource Recovery and Circular Economy Act, 2016)?</li> <li>What is the producer's step-by-step process for preparing the product supply report, including what systems or applications are used to track product supply and what reports are used? (Ensure that all details required to understand how the product supply report is prepared are documented.)</li> <li>What is the producer's methodology for determining the weight and units of the products supplied in Ontario?</li> </ul> </li> </ol>	<ul> <li>Example: Per discussion with <u>lidentify name and position of employee you inquired of</u>].</li> <li>Company X is a tires producer, as company X is the producer for [identify brand names of products your company is a producer for].</li> <li>[Sample description of marketing process, supply and tracking process, and SKU set up; Company X designs, manufactures, and sells tires all over North America, with one distribution center located in Ontario. The tires are sold online and in-retail stores. SKU is set up for every tire type with the product weight and dimensions. All sales in Ontario, including online sales, are tracked in SAP, and Ontario sales are identified by province code ("ON").</li> <li>[Sample description of methodology for determining supply, process for preparing supply report, determination of weight: Every month, a sales report is generated from SAP to summarize all tires materials sold in the province of Ontario. The monthly total obligated weight is then calculated by multiplying the total units supplied with each product's actual weight. The annual total is the sum of the monthly total.]</li> <li>[Sample description of exclusions: The methodology to determine whether a product is obligated is by reviewing the Tires regulation and RPRA's compliance bulletin. We use the actual weight methodology and the actual weight sold in Ontario to determine the total tires supplied.]</li> </ul>

<ol> <li>Select samples of obligated SKUs in accordance with <u>Table 1</u> of Registry Procedure – Audit (Appendix A – Tire Supply Data Verification) and perform the</li> </ol>	Example 1: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. Actual weight is used, and each was agreed to the manufacturer's specification.
<ul> <li>following for each:</li> <li>If actual weight is used, agree it to the manufacturer's specifications.</li> <li>If calculated weight is used, compare the calculation to the WCFs in <u>Appendix A – Registry Procedure: Weight Conversion Factors</u> to determine if the products were reported in the correct categories and if the WCFs were applied correctly.</li> <li>If any discrepancies are noted, provide details of the findings including the verified weight and its impact on the total supply weight reported to RPRA.</li> </ul>	<ul> <li>OR</li> <li>Example 2: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. Calculated weight is used and the calculation and category for each was agreed to the WCFs in the Registry Procedure.</li> <li>OR</li> <li>Example 3: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. We noted that the weight used for 5 SKUs did not agree to the manufacturer's specification. Upon extrapolating the samples, we noted that it would understate the total weight by 400 kg. Therefore, the tires weight reported to DEPEN extended to the total weight by 400 kg.</li> </ul>
<ul> <li>3. Validate the accuracy of the product units reported.</li> <li>If actual number of units is used, agree it to the producer's sales records to validate the total units reported. Provide details of findings.</li> <li>If calculated number of units is used:</li> <li>Agree the Ontario population to the most recent Statistics Canada official census,</li> <li>Agree the population of each province and territory in Canada in which the producer sells tires to the most recent Statistics Canada official census, and recalculate the number of Ontario units supplied based on Appendix A.2 of Tires Verification and Audit Procedure</li> </ul>	<ul> <li>RPRA was adjusted to reflect the accurate weight.</li> <li>Example 1: Actual number of units is used, and the reported number of tires supplied in Ontario was agreed to the sales records for the [year]. [If actual number of units varies from what was reported, identify the variance with the phrase "Exception noted" and describe the variance, for example: "A variance of 500 units under-reported."]</li> <li>OR</li> <li>Example 2: Calculated number of units is used, and the following was performed: <ul> <li>Ontario population used in the calculation was agreed to the [YEAR] Statistics Canada official census,</li> <li>The population of [PROVICES AND TERRITORIES] used in the calculation [WAS/WERE] agreed to the reported number of tires sold in Ontario was agreed to [YEAR] Statistics Canada official census, and</li> <li>[If calculated number of units varies from what was reported, identify the variance with the phrase "Exception noted" and describe the variance of the variance of the phrase of units varies from what was reported, identify the variance with the phrase "Exception noted" and describe the variance, for example: "A variance of 500 units under-reported."]</li> </ul></li></ul>

4.	<ul> <li>Obtain a complete listing of SKUs and document how the producer determines which tires are included in the tire supply report and which ones, if any, are excluded, based on the definition of "tire" in Ontario Regulation 225/18: Tires. Select samples of non-obligated SKUs in accordance with <u>Table 1</u> of Registry Procedure – Audit (Appendix A – Tire Supply Data Verification) and assess if they are indeed not within the definition of "tire"</li> <li>If any discrepancies are noted, provide details of the findings including the verified weight and its impact on the total supply weight reported to RPRA</li> </ul>	Example: Company X maintains a master list of SKUs which is determined based on the definition of "tire" in Ontario Regulation 225/18 : Tires. The company has over 500 non-obligated SKUs, therefore 60 non-obligated SKUs were selected from a report obtained from SAP. Each non-obligated SKU selected did not meet the definition of "tires," as applicable.
5.	<ul> <li>Conduct an analysis to assess the reasonableness of the selected tire supply transactions</li> <li>Investigate and document any tire retail locations with zero tire sales or any tire products with zero sales in the year.</li> </ul>	Example: In [YEAR], there was zero tire sales in retail location A. It was because of [REASON]. OR Example: In [YEAR], there was zero sales for Product 1. It was because [REASON].
6.	Confirm the accuracy and completeness of the reporting of obligated products supplied to the Ontario market by sampling one month's data and comparing the raw sales report with the obligated product supply report. Select samples in accordance with Table 1 of Registry Procedure – Audit (Appendix A – Tire Supply Data Verification) and scrutinize the variances and validate if they are reasonable. Provide details of findings.	<b>Example:</b> The month of May [YEAR] was selected, and the raw sales report was compared to the obligated product supply report. After comparing the raw sales report in May with the invoices company X claimed contained obligated product, I found 20,000 invoices company X claimed with no obligated product. I selected 60 out of the 20,000 invoices and found none of them are tires.
7.	<ul> <li>Select samples in accordance with <u>Table 1</u> of Registry Procedure – Audit (Appendix A – Tire Supply Data Verification) of manual adjustments made to the product supply report and assess if they are reasonable. Provide details of findings.</li> <li>Products supplied into Ontario and subsequently shipped out of Ontario will result in an adjustment to the supply report.</li> </ul>	<b>Example:</b> Company X made manual adjustments to 600 invoices listed in the product supply report, therefore 60 of the 600 invoices were selected. The adjustments were to remove tires from retailer A invoices because they were initially sold to retailer A located in Toronto and later shipped to retailer B in Quebec. The adjusted weights were removed from the total weights before reporting to RPRA.

<mark>Print Name</mark>

<mark>Signature</mark>

Title

### Appendix B – Sample report for internal Verifier – Large producers that are vehicle manufacturers.

Date Address

Dear RPRA,

As a [describe the verifier's qualifications], I, [complete name of the verifier] am a Qualified Person as defined in the RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u>, I have performed the following procedures using RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u> to assist [name of producer – referred to as Company X in rest of template] in the preparation of the Tires supply reporting to meet the verification requirement.

- [weight] kgs of [tires] Company X supplied in [Year]
- [units] of [tires] Company X supplied in [Year]

Registry Procedure:	Findings [Findings must be adapted to the particular facts of your company. Also, sample findings below refer only to tires. If you are reporting on other materials, you must also include separate procedures and findings for those materials. (if applicable)]
<ol> <li>Document responses for the following questions:         <ul> <li>Obtain a complete list of vehicle models and understand if any models come equipped with a spare tire</li> <li>Inquire about employee leasing program and confirm that those tires are included</li> <li>Inquire about national account vehicle transactions (e.g. rental companies and municipal government) and confirm if those tires are included</li> <li>Inquire about any other vehicle supply programs and confirm if those tires are included</li> <li>Inquire about any other vehicle supply programs and confirm if those tires are included</li> <li>Assess and document the producer's obligation based on the definition of a producer (refer to Ontario Regulation 225/18: Tires)</li> <li>Inquire and document the producer's treatment of tires mounted on vehicles and tires supplied separately from vehicles (e.g. winter tires supplied with a new vehicle and replacement tires) in relation to the tire supply report submitted to RPRA</li> <li>Assess and document the producer's methodology to determine how the tires were supplied or marketed in Ontario (refer to the definition of "market" in s. 59 of the Resource Recovery and Circular Economy Act, 2016). Inquire and document the producer's methodology to prepare the new tire supply report</li> <li>Document what system or applications are used to track tire supply</li> <li>Document what reports are used</li> <li>Document what reports are used</li> <li>Document detailed step-by-step procedures that demonstrate how tire supply report is prepared</li> <li>What is the producer's methodology for determining the weight of the products supplied in Ontario?</li> </ul> </li> </ol>	<ul> <li>Example: Per discussion with [identify name and position of employee you inquired of]:</li> <li>Company X is a tires producer, as company X is the producer for [identify brand names of products your company is a producer for].</li> <li>[Sample description of marketing process, supply and tracking process, and SKU set up: Company X designs, manufactures, and sells vehicles all over North America, with one distribution center located in Ontario. The vehicles (with tires mounted on vehicles and/or supplied separately from vehicles) are sold online and in-retail stores. The company also has employee leasing program wherein the tires are included with the vehicles. SKU is set up for every tire type with the product weight and dimensions. All sales in Ontario, including online sales, are tracked in SAP, and Ontario sales are identified by province code ("ON").</li> <li>[Sample description of methodology for determining supply, process for preparing supply report, determination of weight: Every month, a sales report is generated from SAP to summarize all tires materials supplied in the province of Ontario. The monthly total obligated weight is then calculated by multiplying the total units supplied with each product's actual weight. The annual total is the sum of the monthly.</li> </ul>

<ul> <li>2. Select samples of obligated SKUs in accordance with <u>Table 1</u> of <u>Registry Procedure – Audit</u> (<u>Appendix A – Tire Supply Data Verification</u>) and perform the following for each:</li> <li>If actual weight is used, agree it to the manufacturer's specifications.</li> <li>If calculated weight is used, compare the calculation to the WCFs in <u>Appendix A – Registry Procedure: Weight Conversion Factors</u> to determine if the products were reported in the correct categories and if the WCFs were applied</li> </ul>	<ul> <li>Example 1: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. Actual weight is used, and each was agreed to the manufacturer's specification.</li> <li>OR</li> <li>Example 2: Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. Calculated weight is used and the calculation and category for each was agreed to the WCFs in the Registry Procedure.</li> <li>OR</li> </ul>
<ul> <li>correctly.</li> <li>If any discrepancies are noted, provide details of the findings including the verified weight and its impact on the total supply weight reported to RPRA.</li> </ul>	<b>Example 3:</b> Company X has over 500 SKUs, therefore 60 SKUs were selected from a report obtained from SAP. We noted that the weight used for 5 SKUs did not agree to the manufacturer's specification. Upon extrapolating the samples, we noted that it would understate the total weight by 400 kg. Therefore, the tires weight reported to RPRA was adjusted to reflect the accurate weight.
<ul> <li>3. Validate the accuracy of the product units reported.</li> <li>If actual number of units is used, agree it to the producer's sales records to validate the total units reported. Provide details of findings. <ul> <li>If calculated number of units is used:</li> <li>Agree the Ontario population to the most recent Statistics Canada official census,</li> <li>Agree the population of each province and territory in Canada in which the producer sells tires to the most recent Statistics Canada official census, and</li> <li>Recalculate the number of Ontario units supplied based on <u>Appendix A.2 of Tires Verification and Audit Procedure</u></li> </ul> </li> </ul>	<ul> <li>Example 1: Actual number of units is used, and the reported number of tires supplied in Ontario was agreed to the sales records for the [year]. [If actual number of units varies from what was reported, identify the variance with the phrase "Exception noted" and describe the variance, for example: "A variance of 500 units under-reported."]</li> <li>OR</li> <li>Example 2: Calculated number of units is used, and the following was performed: <ul> <li>Ontario population used in the calculation was agreed to the [YEAR] Statistics Canada official census,</li> <li>The population of [PROVICES AND TERRITORIES] used in the calculation [WAS/WERE] agreed to the reported number of tires sold in Ontario was agreed to [YEAR] Statistics Canada official census,</li> <li>[If calculated number of units varies from what was reported, identify the variance with the phrase "Exception noted" and describe the variance, for example: "A variance of 500 units under-reported number of tires sold in Ontario was agreed to [YEAR] Statistics Canada official census, and</li> </ul> </li> </ul>

<ul> <li>4. Select samples of vehicles in accordance with <u>Table 1</u> of <u>Registry Procedure – Audit (Appendix A – Tire Supply Data</u> <u>Verification</u>). For each sample selected, validate the types of tires reported.</li> <li>If any discrepancies are noted, provide details of the findings including the verified weight and its impact on the total supply weight reported to RPRA</li> </ul>	Example: Company X has over 500 vehicle sale transactions, therefore 60 of them were selected from a report obtained from SAP. The types of tires were validated for each vehicle sample selected. There were no discrepancies noted.
<ul> <li>5. Conduct an analysis to assess the reasonableness of the selected tire supply transactions <ul> <li>Investigate any retail vehicle dealers with zero car transactions or any vehicle models with zero transactions in the year</li> </ul> </li> </ul>	Example: In [YEAR], there was zero tire sales in retail location A. It was because of [REASON]. OR Example: In [YEAR], there was zero sales for Product 1. It was because [REASON].
6. Confirm the accuracy and completeness of the rrecording of obligated products supplied to the Ontario market by sampling one month's data and comparing the raw sales report with the obligated product supply report. Select samples in accordance with <u>Table 1</u> of <u>Registry Procedure –</u> <u>Audit (Appendix A – Tire Supply Data Verification)</u> and scrutinize the variances and validate if they are reasonable. Provide details of findings.	<b>Example:</b> The month of May [YEAR] was selected, and the raw sales report was compared to the obligated product supply report. After comparing the raw sales report in May with the invoices company X claimed contained obligated product, I found 20,000 invoices company X claimed with no obligated product. I selected 60 out of the 20,000 invoices and found none of them are tires.
<ul> <li>7. Select samples in accordance with <u>Table 1</u> of <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data</u> <u>Verification)</u> of manual adjustments made to the product supply report and assess if they are reasonable. Provide details of findings.</li> <li>Products supplied into Ontario and subsequently shipped out of Ontario will result in an adjustment to the supply report.</li> </ul>	<b>Example:</b> Company X made manual adjustments to 600 invoices listed in the product supply report, therefore 60 of the 600 invoices were selected. The adjustments were to remove tires from retailer A invoices because they were initially sold to retailer A located in Toronto and later shipped to retailer B in Quebec.

## Print Name

<mark>Signature</mark>

Title

# Appendix C – Sample report for internal Verifier – Medium Producers that are tire manufacturers or tire wholesalers.

Date Address

Dear RPRA,

As a [describe the verifier's qualifications], I, [complete name of the verifier] am a Qualified Person as defined in the RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u>, I have performed the following procedures using RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u> to assist [name of producer – referred to as Company X in rest of template] in the preparation of the Tires supply reporting to meet the verification requirement.

- [weight] kgs of [tires] Company X supplied in [Year]
- [units] of [tires] Company X supplied in [Year]

Registry Procedure:	Findings [Findings must be adapted to the particular facts of your company. Also, sample findings below refer only to tires. If you are reporting on other materials, you must also include separate procedures and findings for those materials. (if applicable)]
<ol> <li>Document responses for the following questions:         <ul> <li>Assess and document the producer's methodology to prepare the tire supply report (refer to the definition o "market" in s. 59 of the Resource Recovery and Circular Economy Act, 2016)</li> <li>Evaluate the producer's methodology to determine the weight of tires supplied in Ontario</li> </ul> </li> </ol>	Example: Per discussion with <u>[identify name and position of employee</u> you inquired of]:

<ul> <li>8. Select ten non-obligated SKUs and assess if they ar indeed not within the definition of "tire".</li> <li>If any discrepancies are noted, provide details of the findings including the verified weight and its impact on the total supply weight reported to RPRA.</li> </ul>	e Example 1: Company X selected 10 non-obligated SKUs from a report obtained from SAP. Each non-obligated SKU selected did not meet the definition of "tires," as applicable.
<ol> <li>Select ten tire supply transactions to ensure the correct tire weight is reported (i.e. validate tire classification and unit tire weight per manufacture specification)</li> </ol>	<ul> <li>Example 1: There were 10 SKUs selected from a report obtained from SAP. Actual weight is used, and each was agreed to the manufacturer's specification.</li> <li>OR</li> <li>Example 2: 10 SKUs were selected from a report obtained from SAP. Calculated weight is used and the calculation and category for each was agreed to the WCFs in the Registry Procedure.</li> <li>OR</li> <li>Example 3: 10 SKUs were selected from a report obtained from SAP. We noted that the weight used for 2 SKUs did not agree to the manufacturer's specification. Upon extrapolating the samples, we noted that it would understate the total weight by 400 kg. Therefore, the tires weight reported to RPRA was adjusted to reflect the accurate weight.</li> </ul>
4. Confirm the accuracy and completeness of the recording of supply to the Ontario market by sampling one month's data and comparing the raw sales report with the obligated tire supply report. If any variances are identified, investigate and validate if they are reasonable.	

<mark>Print Name</mark>

<mark>Signature</mark>

**Title** 

# Appendix D – Sample report for internal Verifier – Medium Producers that are vehicle manufacturers.

Date Address

Dear RPRA,

As a [describe the verifier's qualifications], I, [complete name of the verifier] am a Qualified Person as defined in the RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u>, I have performed the following procedures using RPRA's <u>Registry</u> <u>Procedure – Audit (Appendix A – Tire Supply Data Verification)</u> to assist [name of producer – referred to as Company X in rest of template] in the preparation of the Tires supply reporting to meet the verification requirement.

- [weight] kgs of [tires] Company X supplied in [Year]
- [units] of [tires] Company X supplied in [Year]

Registry Procedure:	Findings [Findings must be adapted to the particular facts of your company. Also, sample findings below refer only to tires. If you are reporting on other materials, you must also include separate procedures and findings for those materials. (if applicable)]
<ol> <li>Document responses for the following questions:         <ul> <li>Assess and document the producer's methodology to prepare the tire supply report (refer to the definition of "market" in s. 59 of the Resource Recovery and Circular Economy Act, 2016)</li> <li>Evaluate the producer's methodology to determine the weight of tires supplied in Ontario</li> </ul> </li> </ol>	Example: Per discussion with <u>identify name and position of employee</u> you inquired of]:

2.	<ul> <li>Select ten vehicles from the tire supply report and validate the types and number of tires reported.</li> <li>If any discrepancies are noted, provide details of the findings including the verified weight and its impact on the total supply weight reported to RPRA.</li> </ul>	Example 1: 10 vehicles were selected from a report obtained from SAP. The number and types of tires were agreed to the reported data.
5.	Select ten vehicle supply transactions to ensure the correct tire weight is reported (i.e. validate tire classification and unit tire weight per manufacturer's specification)	<ul> <li>Example 1: There were 10 vehicles selected from a report obtained from SAP. Actual tire weight is used, and each was agreed to the manufacturer's specification.</li> <li>OR</li> <li>Example 2: 10 vehicles were selected from a report obtained from SAP. Calculated tire weight is used and the calculation and category for each was agreed to the WCFs in the Registry Procedure.</li> <li>OR</li> <li>Example 3: 10 vehicles were selected from a report obtained from SAP. We noted that the tire weight used for 2 vehicles did not agree to the manufacturer's specification. Upon extrapolating the samples, we noted that it would understate the total weight by 50 kg. Therefore, the tires weight reported to RPRA was adjusted to reflect the accurate weight.</li> </ul>
6.	Confirm the accuracy and completeness of the recording of supply to the Ontario market by sampling one month's data and comparing the raw sales report with the obligated tire supply report. If any variances are identified, investigate and validate if they are reasonable.	Example: The month of May [YEAR] was selected, and the raw sales report was compared to the obligated product supply report. After comparing the raw sales report in May with the invoices company X claimed contained obligated product, I found 2000 invoices company X claimed with no obligated product. I selected 60 out of the 2000 invoices and found none of them are tires.

<mark>Print Name</mark>

<mark>Signature</mark>

**Title**