Comments on document GRB-53-11 - (Russian Federation) - Proposal for draft amendments to Regulation No. 117 (Tyre rolling noise, wet grip adhesion and rolling resistance)

The below comments have been already made verbally during the 53rd session of GRB last February 2011. This document has the only purpose to have those comments in writing.

About proposal I of the Russian Federation

Annex 6., Test procedure for measuring rolling resistance
Paragraph 4.6.1 item (a), *change to the approved international norms of skim test load*.

<u>Comments</u>: ETRTO recommends keeping the skim load values as defined in ISO 28580. In case the skim load values should be modified, this should be done at ISO level by adapting ISO 28580.

Supporting Information:

- The SAE standards J2169 and J2452 give recommended values, they do not limit the maximum allowed skim load value.
- The skim load definition in R117 has recommended values, but in addition to that maximum values are defined. This makes R117 a more detailed procedure.
- The SAE standards specify to use a rough grit-paper surface, to avoid tyre slippage during the test. On a smooth steel surface, higher skim load values are required to avoid tyre slippage and to keep the tyre rotating on the drum surface.
- Especially for C3 tyres a higher skim load value is useful, in order to avoid load regulation problems on the test machines and to cope with eventual radial runout or radial force variation of C3 tyres. In GRB-53-inf11e, only one small 17.5" tyre was tested.

About proposal III of the Russian Federation

Annex 6., Test procedure for measuring rolling resistance Appendix 1, paragraph 4, item (d), replace time measurement accuracy norm, to read: "(d) time: \pm 0.02 s **0.5 ms**"

<u>Comments:</u> ETRTO agrees to the proposal III to replace the time measurement accuracy norm. Also this change should be done at ISO level by adapting ISO 28580.