<u>Transmitted by the representative of ETRTO</u>

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English version (reference version)

High Speed Test Harmonization in the gtr for Tyres

The harmonisation of the high speed tests for the gtr for Tyres presents special difficulties. There are two main tests in use today, the one from UNECE Regulation 30 and a second one from USA FMVSS 139. A third test from USA FMVSS 109 is also used by certain countries, but it is a less severe, lower speed version of the new test from FMVSS 139.

At the very earliest stages of the work on the gtr for Tyres, the tyre industry stated its concerns about the possibility of creating a new test that fulfils both sets of requirements. These concerns were expressed by the representatives of the three major tyre industry organisations during the *ad hoc* meeting held in June of 2006 in Geneva to prepare the launch of the gtr for Tyres at the WP29 139th session. It was stated at that time that creating a new, harmonised test would require from three to five years of research and development effort. This position has been repeated at the two subsequent official *ad hoc* tyre-gtr working group meetings with the Contracting Parties.

We must remember that any newly developed test would have to assure that all tyres that will pass the new test would also pass both the existing tests, while at the same time not unduly penalizing the industry with a test so severe that it will not represent real-world use and that a significant percentage of the current population of tyres would no longer pass the new test. Given that the objectives of the tests are different, and that the testing conditions are also different (the time, the number of steps, the speed, the load and the temperature are all different for the two tests) it was felt that developing a totally new test would require several years of research and development work, at a considerable cost, borne almost solely by the industry.

In light of those considerations, the industry considered and then proposed other options, which are:

- 1. Develop a new test, as described above, with the consequent delay, cost and uncertainty about the outcome;
- 2. Use both tests on all tyres, which would place a considerable testing burden on the tyre industry especially for those tyres that were not destined to be commercialised in all markets around the world;
- 3. Or, determine the point, in terms of speed rating, where one test becomes more severe than the other, and use the most severe test on the tyre in question.

This proposal was officially made to the *ad hoc* working group of the gtr for Tyres in September 2006 at the meeting in Geneva. The consensus of the Contracting Parties present at the meeting was that the most judicious choice would be to investigate the third option. This decision is formalised in the official meeting minutes (UNECE document TYREgtr-02-01, last paragraph of §8.4 and Attachment VII).

With that decision made, the tyre industry is currently proceeding with a set of designed experiments that will attempt to demonstrate that one test becomes more severe than the other for certain speed ratings of tyres. The justification of the experimental method and the preliminary data from those experiments will be shared with interested Contracting Parties at a meeting to be held in July of this year.

We hope this presents you with enough information to make the needed policy decision on the harmonisation of the high speed tests at your June 2007 AC3 meeting. Please feel free to contact us should you have any further questions or require clarification on this subject.

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