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Item 5.5. of the provisional agenda

**PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 109
(Retreaded pneumatic tyres for commercial vehicles and their trailers)**

Submitted by the experts from the Bureau International Permanent des Associations
de Vendeurs et Rechapeurs de pneu (BIPAVÉR)

Note: The text reproduced below has been prepared by the experts from BIPAVÉR in order to insert into the Regulation new provisions for retreaded tyres with additional sidewall protection. The modifications to the existing text of the Regulation are marked in **bold** characters.

Note: This document is distributed to the Experts on Brakes and Running Gear only.

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A. PROPOSAL

Insert a new paragraph 2.42.1., to read:

"2.42.1. "Additional Sidewall Protection (ASP)" is an additional material applied to the sidewall(s) of the casing for improving resistance against sidewall abrasion on special tyres in urban usage."

Insert a new paragraph 3.2.7.1., to read:

"3.2.7.1. The abbreviation "ASP" if additional material is applied to the tyre for increased resistance against sidewall abrasion."

Insert new paragraphs 6.5.5. and 6.5.6., to read:

"6.5.5. After retreading, the dimensions of the retreaded tyre, when measured in accordance with Annex 6 to this Regulation, must conform either to dimensions calculated according to the procedures in paragraph 7. or to those given in Annex 5 to this Regulation. Note that the maximum overall width of a retreaded radial tyre with additional ASP(s) applied may be up to maximum 8 mm per protected sidewall greater than the maximum section width of a new, original tyre permitted by Regulation No. 54."

6.5.6. For radial tyres with ASP(s), the maximum allowed speed rating is index J (100km/h)."

Insert a new paragraph 7.1.4.3., to read:

"7.1.4.3. For radial tyres with ASP (s), the actual overall width may exceed the maximum section width of a new, original tyre permitted by Regulation No. 54 by up to maximum 8 mm per protected sidewall."

Annex 5, amend to read:

"FOR THIS INFORMATION REFER TO ANNEX 5 OF ECE REGULATION NO. 54

Note that with reference to to Regulation No. 54, but by no more than 1.5 per cent.

The section width of a radial tyre with ASP(s) may in all cases be greater than that shown in the tables of Annex 5 to Regulation No. 54, but by no more than 8 mm per protected sidewall."

B. JUSTIFICATION

When Regulation No. 109 was created, the long-time practice of applying ASP(s) for enhancing safety and durability of special tyres in urban use was not considered. Consequently, many casings would not be retreadable with ASP(s) because of the section width tolerances for Regulation No. 109.

ASP's are applied in the retread process to existing casings, in order to provide additional abrasion protection of the sidewall in aggressive urban usage. ASP can be applied on one sidewall or on both sidewalls depending on the user conditions, adding safety and value for the specific users, who are mainly city bus, waste hauling operations or other in city start and stop operations. Fitments on vehicles are depending on local conditions and described in local user recommendations.

To correct this incoherence, it is proposed to amend Regulation No. 109, in order to allow the use of radial retreaded tyres with ASP's, with an additional allowance of maximum 8 mm per protected sidewall over the maximum authorized overall width for the same tyre in Regulation No. 54.

The purpose of this proposal is to amend Regulation No. 109 to take into account this already existing practice, to avoid that transport and retread industry be penalized. It should be noted that this modification will actually not change the overall width of tyres in the market, but will simply regularize a pre-existing, but unrecognized condition.
