

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

Note: The text reproduced below has been prepared by the experts from BIPAVER in order to insert into the Regulation new provisions for retreaded tyres with additional sidewall protection. It is based on document ECE/TRANS/WP.29/GRRF/2006/26, considered at the sixtieth GRRF session (see report ECE/TRANS/WP.29/GRRF/60, para. 34). The modifications to the existing text of the Regulation are marked in **bold** characters.

A. PROPOSAL

Insert a new paragraph 2.42.1., to read:

"**2.42.1. "Additional Sidewall Protection (ASP)" is an additional protective rubber layer applied to the sidewall of the casing for improving resistance against sidewall abrasion on tyres in urban use.**"

Insert a new paragraph 3.2.7.1., to read:

"**3.2.7.1. In the case a tyre with an ASP on the out sided sidewall exceeds the max overall section width of paragraph 6.5.4. the abbreviation 'ASP' must be applied to both sidewalls. "**

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 applied may be up to maximum 8 mm greater than the maximum section width of the same tyre size description permitted by Regulation No. 54.**

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

Insert a new paragraph 7.1.4.3., to read:

"**7.1.4.3. For radial tyres with ASP, the actual overall width may be up to maximum 8mm greater the section width of the same tyre size description permitted by Regulation No. 54."**

Insert a new paragraph 3.2.13 to read:

"**3.2.13. The inscription "ASP" must be applied to both sidewalls for radial tyres having ASP fitted. In the case of tyres fitted with ASP, the word "OUTSIDE" moulded into the sidewall with the fitted ASP."**

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 overall section width of a radial tyre with ASP 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."**

## B. JUSTIFICATION

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

ASP is applied in the retread process to existing casings, in order to provide additional abrasion protection of the sidewall in aggressive urban usage. ASP is to be applied on one sidewall 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, with an additional allowance of maximum 8 mm over the maximum authorized overall width for the same tyre in Regulation No. 54, and indicate with a clear symbol that this ASP is to be fitted outside to not reduce the min dual spacing when tyres are fitted in dual.

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.

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