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**ECONOMIC COMMISSION FOR EUROPE**

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World Forum for Harmonization of Vehicle Regulations

Working Party on Brakes and Running Gear

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Item 8(d) of the provisional agenda

TYRES

Regulation No. 109  
(Retreaded pneumatic tyres for commercial vehicles and their trailers)

Proposal for draft amendments to Regulation No. 109

Submitted by the experts from the Netherlands <sup>\*/</sup>

The text reproduced below was prepared by the expert of the Netherlands in order to insert into the Regulation new provisions for retreaded tyres with additional sidewall protection (ASP). This document supersedes the former proposal ECE/TRANS/WP.29/GRRF/2008/6 and is based on informal document GRRF-63-24, distributed during the sixty-third session of the Working Party on Brakes and Running Gear (GRRF) (see report ECE/TRANS/WP.29/GRRF/63, para. 33). The modifications to the existing text of the Regulation are marked in **bold** characters.

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<sup>\*/</sup> In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance performance of vehicles. The present document is submitted in conformity with that mandate.

A. PROPOSAL

Paragraph 2.37., amend to read (including the insertion of a new footnote \*/):

- "2.37. "Retreading" means the generic term for reconditioning a used tyre by replacing the worn tread with new material. It may also include renovation of the outermost sidewall surface (**e.g. ASP**) and replacement of the crown plies or the protective breaker. It covers the following process methods:
- 2.37.1. "Top capping" - replacement of the tread;
- 2.37.2. "Re-capping" - replacement of the tread and with the new material extending over part of the sidewall; \*/
- 2.37.3. "Bead to bead" - replacement of the tread and renovation of the sidewall including all or part of the lower area of the tyre. \*/

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\*/ Including the process method used in applying of ASP."

Paragraph 2.42., amend to read:

- "2.42. "Sidewall veneer" is a material used to cover the sidewalls of the casing thereby allowing the required markings to be formed. This material can also be used to protect the outside of the tyre against abrasion in service. In this case the protective rubber layer is called ASP (additional sidewall protection)."

Insert a new paragraph 7.1.4.3., to read:

- "**7.1.4.3. For retreaded radial tyres with nominal section width exceeding 305 mm for dual mounting (twinning) and a nominal aspect ratio higher than 60, an additional sidewall protective rubber layer (ASP) may be applied to a maximum of 8 mm greater than the overall width of the same tyre size description permitted by Regulation No. 54 provided that:**
- (a) This rubber layer is applied to one sidewall only;
- (b) The sidewall concerned is marked with the wording "ASP" and the wording "OUTSIDE", both markings with a minimal height of 8 mm;
- (c) The maximum allowed speed rating is index J (100 km/h)."

Annex 5, amend to read:

".....

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

**The overall section width of a retreaded radial tyre with an 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

The long-time practice of applying ASP for enhancing safety and durability of 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 retreaded radial tyres with a section width greater than 305 mm, fitted with an ASP, an additional allowance of maximum 8 mm over the maximum authorized overall width for the same tyre in Regulation No. 54, and to indicate with text that this ASP is to be fitted to the outside of the wheel fitments to ensure the minimum dual spacing is not reduced.

The purpose of this proposal is to amend Regulation No. 109 to take into account this 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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