

ETRTO comments on ECE-TRANS-WP29-GRB-2011-11e

I. Position

The European Tyre Industry cannot accept the adoption of the amendments to Regulation No. 117 proposed in the working document ECE-TRANS-WP29-GRB-2011-11e **because the proposed amendments are not in line with the GRB mandate and would make existing machines operating under approved ISO standards inoperative.**

II. Justification.

Referring to the report of the GRB 53 document ECE/TRANS/WP.29/GRB/51, § 20 and §21, the RF expert was mandated by the GRB Chairman to clarify his position to use, in the **existing test method**, as parameter the "deceleration of the test drum and tyre assembly in the approximate form $\Delta\omega/\Delta t$ or in the exact form $d\omega/dt$ ".

The amendments submitted by the Russian Expert in the working document ECE-TRANS-WP29-GRB-2011-11e are not in line with the mandate for the following reasons:

- The proposed amendments to paragraph 4.6.1 are contradictory with existing ISO standards (18164 and 28580) and with the dispositions already approved by the Contracting Parties. The proposed modification of the ISO-approved skimload values could make it impossible to perform tests according to the ISO-approved force, torque and power techniques due to tire slippage and load regulation issues.
- Amendment proposed to paragraphs 5.1.5 and 5.2.5 **excludes** the deceleration method existing in ISO standards 18164 and 28580 and corresponding to the dispositions already approved by the Contracting Parties by a new one which is not approved by ISO. Their adoption would make all machines using the ISO-approved deceleration technique inoperative.
- In addition, the formulation differs from the one of previous ECE-TRANS-WP29-GRB-53-inf07e since the description of the parameters of existing ISO methods are crossed out in this new document. In consequence, the adoption of these amendments would make all existing machines operating under the ISO-approved deceleration technique inoperative and make compulsory a non-internationally approved measurement method.

We raise the fact to the CPs that the adoption of these amendments would make existing machines operating under approved ISO standards inoperative and make compulsory a non-standard and internationally not approved testing procedure for the measurement of Rolling Resistance. As a consequence, the adoption of these amendments would have a strong impact on the ability of European Tyre Industry to meet its obligations regarding the implementation of ECE R117-02 and EU R661/2009.