

Reference:

Document ECE/TRANS/WP.29/GRB/2012/8 from OICA

Proposal:

Regarding Annex 3, paragraph 2.2.2., the European tyre industry proposes to amend the conditions of testing to read:

2.2.2. The tyres to be used for the test shall be representative for the **vehicle** and shall be selected by the vehicle manufacturer and recorded in Annex 9. They shall correspond to one of the tyre sizes designated for the vehicle as original equipment. The tyre is or will be commercially available on the market at the same time as the vehicle.² The tyres shall be inflated to the pressure recommended by the vehicle manufacturer for the test mass of the vehicle. **The tyres shall have a legal tread depth.**

² The tyre contribution for overall sound emission being important, this vehicle Regulation **has to take take** into account the tyre/road sound emission regulations. Snow tyres, **traction tyres** and special **use** tyres according to UNECE Regulation No. 117 shall be excluded during type-approval- and COP-measurements on request of the manufacturer.

Comments

ETRTO has expressed and repeated several times concerns regarding the consequence for a double legislation on the tyre and the fact that limit values could be higher than the current R51.02 if the proposed amendments by the tyre industry are not considered in the new testing conditions. When considering limits, the legislator has to take into account the impact on legislation when referring to an ISO standard which is an engineering testing procedure.

The same concern was highlighted by the European Commission in document WP29-156-28-EC proposal N°3).

Proposal (3): Specific cases

- Special allowance kept for some vehicles (sport cars, off road) and removed for others (direct injection diesel)
- Avoid double legislation for tyres (General safety Regulation 661/2009 and this proposal)
- Quiet vehicles (electric and hybrid vehicles):
 - Minimum legal framework for sound generating devices based on the GRB work
 - Optional installation of such devices



Also to note that the tyres with a tread depth of at least 80 per cent of the full tread depth are not representative of tyres fitted for vehicle-use on public roads.