

## **Proposal for amendments to document ECE/TRANS/WP.29/GRRF/2014/13**

### **I. Proposal**

Explanatory notes:

The following principles were respected when drafting the text below:

- i. IWVTA only addresses passenger cars (M1 category). Adding other categories could potentially have negative impact on HCV manufacturers (extra work, limitation of commercial offer in countries outside EU) in case a Contracting Party decides to apply the regulation outside of the IWVTA scheme. OICA favours a scope limited to passenger cars, with references to the tyres usually equipping this category.
- ii. In view of the principle above, there is no reference to Class C3 tyres
- iii. The particular context of IWVTA makes some references unnecessary or incomplete (e.g. owner's handbook)
- iv. References to UN Regulation No. 64 (spare wheels) are ~~limited to the conformity of the submitted vehicle to its technical provisions. As~~ **deleted as** UN Regulation No. 64 indeed contains installation requirements for non-standard spare units. OICA is keen that no double approval work is required due to some scope overlap between this draft regulation and UN Regulation No. 64. The wording of the scope clarifies that there is no overlap between the two regulations.
- v. An information form was introduced as Annex 1.

*Paragraph 1.*, amend to read:

"1. Scope

This Regulation applies to the approval of vehicles of category M1<sup>1</sup> with regard to the installation of their tyres;

It does not apply to the approval of vehicles with regard to their:

- (a) Temporary use spare unit, and/or
- (b) Run-flat tyres and/or run-flat system **when operating in their flat tyre running mode**, and/or
- (c) Tyre pressure monitoring system

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<sup>1</sup> As defined in section 2 of the Consolidated Resolution on the Construction of Vehicles (R.E.3) (document TRANS/WP.29/78/Rev.2)."

*Insert a new paragraph 5.1.2.*, to read:

**"5.1.2. Every tyre installed to a vehicle, including where applicable any spare tyre, shall fulfil the technical requirements and transitional provisions of UN Regulation Nos 30, 54 and 117 as applicable."**

*Paragraph 5.2.3.2.1.*, delete.

*Paragraphs 5.2.3.2.2. to 5.2.3.2.4.*, renumber 5.2.3.2.1. to 5.2.3.2.3.

*Paragraph 5.2.4.2., amend to read:*

"5.2.4.2. In the case of some special vehicles, ~~as listed below~~, fitted with tyres of class C2, the "table load-capacity variation with speed" as described in paragraph 5.2.2.2. of this Regulation shall not be applied. In such a case, the tyre maximum load rating to check against the technically permissible maximum axle mass (see paragraphs 5.2.2.1.2. and 5.2.2.1.4.) shall be determined by multiplying the load corresponding to the load capacity index by an appropriate coefficient, **to be defined by the vehicle manufacturer, and** which is related to the type of vehicle and its use, rather than to the maximum vehicle design speed, and the requirements of paragraph 5.2.3.1.2. of this Regulation shall not apply. **The vehicle manufacturer shall demonstrate to the satisfaction of the Technical Service, through the use of documentation, relevancy of this coefficient. Any such documentation shall be appended to the test report.**"

*Paragraph 5.2.5.delete.*

~~"5.2.5. Spare wheels and tyres~~

~~5.2.5.1. In cases where a vehicle is provided with a standard spare unit, it shall be of the same size as the tyres actually fitted to the vehicle.~~

~~5.2.5.2. Every vehicle provided with a temporary use spare unit or run flat tyres shall comply with the technical and transitional provisions of Regulation No. 64 with respect to the requirements concerning the equipment of vehicles with temporary use spare units and run flat tyres."~~

*Annex 1, paragraphs 4.1.5. and 4.1.6., delete.*

*Annex 2, Addendum to communication form, paragraphs 3. to 4.1., delete.*

## II. Justification

### Paragraph 1, Scope

1. The new wording of the scope makes it clear that an inflated Run Flat Tyres (RTF) is in the scope of this "draft tyre installation" regulation, while a deflated RFT is not. A deflated RFT is covered by UN Regulation No. 64. This solution permits to avoid any legal loophole. The RFT should be excluded from the scope of the Regulation only when operating in their flat tyre running mode and then considered as a temporary spare unit. UN Regulation No. 64 will then apply to the vehicle with deflated RFT.

### Paragraph 5.1.2

2. If reference to UN Regulations Nos. 30, 54 and 117 is demanded by GRRF, Industry would favour the wording proposed by the European Commission (email to the interested parties dated 28 October 2013)

### Paragraph 5.2.4.2.

3. The proposed wording improves that of the corresponding EU Regulation (458/2011), in such that the vehicle manufacturer must provide evidence that the proposed coefficient is adequate. The vehicle manufacturer is assumed to have the necessary competence to determine the appropriate coefficient, but nevertheless shall demonstrate it is relevant.

### Paragraph 5.2.5.

4. Since UN Regulation No. 64 is a vehicle regulation, there is no need to refer to it and it is proposed to delete paragraph 5.2.5. This deletion permits to avoid any double

homologation. The draft Regulation on tyre installation and UN Regulation No. 64 will be two independent and complementary vehicle regulations, one dealing with the installation of the tyres, the other dealing with the vehicle behaviour when equipped with a temporary spare wheel. This should permit any Contracting Party to choose which regulation to apply in the context of IWTA.

Annex 1

5. Logical deletion of the entries as a consequence of the deletion of paragraph 5.2.5.

Annex 2. Addendum to communication form, paragraphs 3. to 4.1.

6. While paragraphs 3 and 4 could remain in the draft Regulation, there is no real need for such connection between the draft Regulation on tyre installation and UN Regulation No. 64, as the two regulations are independent.

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