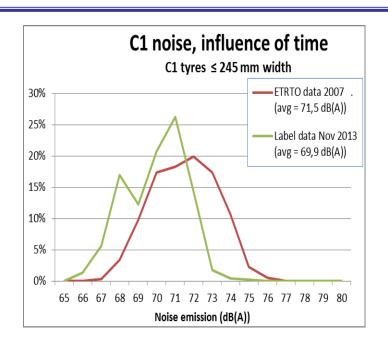
Exchange of information on national and international requirements on noise levels

Reference to documents GRB-60-08, GRB-60-12, GRB-60-14-Rev.1 and GRB-61-03 from the Netherlands.



Ref.:GRB-60-8-Add 1 page 3:

"The 2007 population is based on data from ETRTO for **C1** tyres"

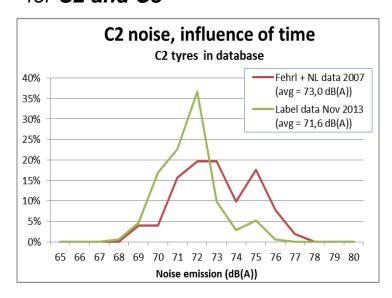


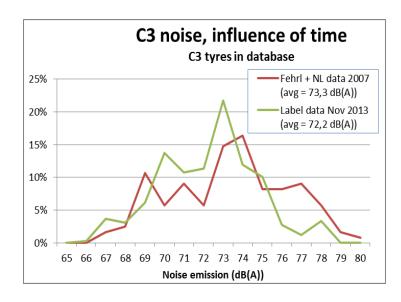
Comments from tyre industry:

No coherence between the two curves because the sources of data are not comparable. One curve is related to homologation data (by family) according to R.117.01 and the other one to label data.



Ref.: GRB-60-8-Add 1 page 3:"The 2007 population is based on FEHRL/TÜV/NL data for **C2 and C3**"





Comments from tyre industry:

The data from FEHRL were not representative of the market nor tyres (sizes, load indexes, speed symbols, market segments, etc.) available in 2007. Morover, few data points available for C2 (19) and C3 (98) tyres. (There are several thousands of tyre types on the market.)



Ref. GRB-60-08 page 3:

"

- The 2013 population is based on the tyre type data base of VACO combined with the label values attached to these tyre types
- A selection of most common types was made on base of manufacturer selection and size selection
- In total 760 C1, 172 C2 and 372 C3 types were included in the study"



Comments from tyre industry:

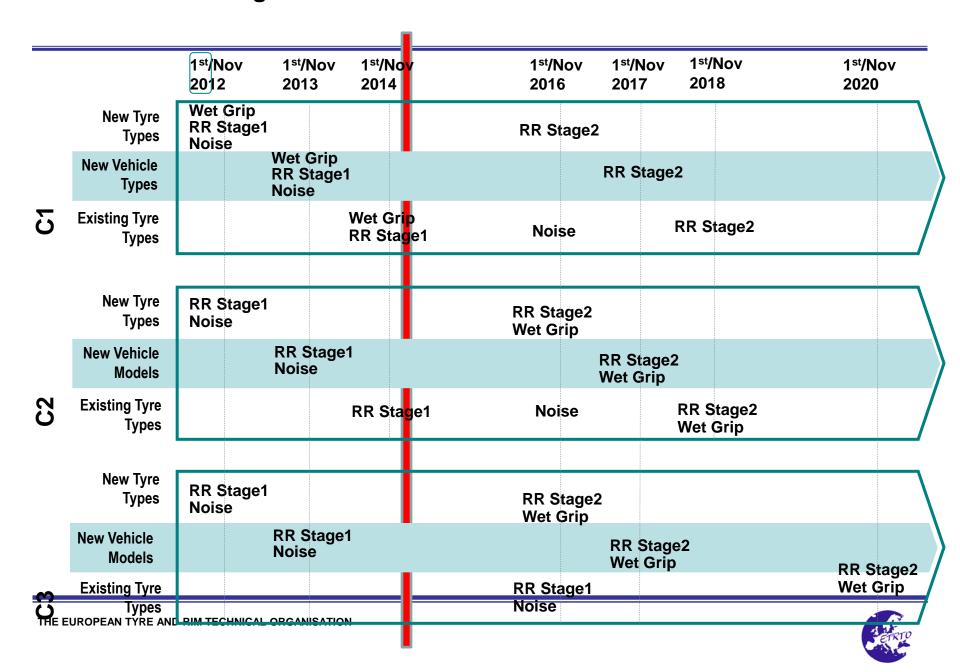
The VACO database use a specific code which is very much related to the EAN coding but there is no indication of the sales volume.

This database is linked to tyres sold in the Netherlands only and may not be representative of tyre sold in countries adopting the 1958 Agreement.

We question the conclusion based on the adopted criteria for sample sizes selection. Tyres that have been excluded are anyhow in the market!



UN Regulation 117 IMPLEMENTATION STEPS



UN Reg. 117.02 time line

The first step of the UN Reg. 117.02 came into force on November 1st, 2012.

This regulation foresees different implementation steps for C1, C2 and C3 tyres.

Tyre industry is in the process to implement those steps that, for some of them are still planned in November 2018 for C1 and C2 tyres and even November 2020 for C3 tyres.

A realistic State of Art and its assessment in terms of future potential for improvement can only be done when all the tyres complying to all UN Reg. 117.02 requirements are on the market.

