

REGULATION No. 117

(Tyres rolling noise and wet grip adhesion)

ETRTO comments to ECE/TRANS/WP.29/GRB/2010/3

The modifications to the existing text of the Regulation are given in bold characters or as strike through.

A. PROPOSAL

The table of contents is missing in the document ECE/TRANS/WP.29/GRB/2010/3

The table of contents as per latest proposal from EC should be anyhow be amended as follow:

Annex 2 – Appendix 1, add to read and renumber subsequent paragraphs:

"Annex 2 - Appendix 1 Approval in accordance to Regulation No. 117"

Annex 2 - Appendix 1 to 3 (former), renumber as Annex 2 – Appendix 2 to 4

Annex 7 – Appendix 1, amend to read :

Annex 7 – Appendix 1 Pictogram definition of "Alpine" symbol ~~3-peak mountain with snowflake~~

The text of the Regulation

Replace ISO 4000-1:[2009] by **ISO 4000-1:[2010]** wherever it appears.

Paragraph 2.1.8, correct numbering to read :

2.18 ~~2.1.8~~ Rolling resistance measurement – Specific definitions

Paragraph 3.2.3, amend to read :

3.2.3. In the case of applications relating to Special Use tyres, a copy of the mould drawing **of the tread pattern** shall be supplied in order to allow verification of the void-to-fill ratio.

Paragraph 4.2.5, add a footnote:

4.2.5. ... tyre is classified as traction. **1/**

1/ Minimum height of marking: refer to dimension C in annex 3 of Reg. 54.

Table "Stage 1" in Paragraph 6.1.1, amend to read :

Stage 1	
Nominal Section Width	Limit dB(A)
145 and lower	72
Over 145 up to 165	73
Over 165 up to 185	74
Over 185 up to 215	75
Over 215	76
The above limits shall be increased by 1 dB(A) for extra load tyres or reinforced tyres and by 2 dB(A) for "Special use tyre" . for tyres classified in category of use "Special" .	

Table "Stage 2" in Paragraph 6.1.1, amend to read :

Stage 2	
Nominal Section Width	Limit dB(A)
185 and lower	70
Over 185 up to 215	71
Over 185 215 up to 245	71
Over 245 up to 275	72
Over 275	74
The above limits shall be increased by 1 dB(A) for snow tyres, extra load tyres or reinforced tyres, or any combination of these classifications.	

Paragraph 6.5.1, amend to read :

- 6.5.1 The tyre shall have a tread pattern with minimum two circumferential ribs, **containing each** ~~each containing~~ a minimum of 30 block-like elements, separated by grooves and/or sipe elements the depth of which has to be minimum ½ of the tread depth, or

Paragraph 6.6, amend to read :

- 6.6 **In order to be classified as a 'Special Use tyre', a tyre shall have a block tread pattern in which the blocks are larger and more widely spaced than for normal tyres and have the following characteristics:**

In order to be coherent with the European reg. 661/2009, add a new paragraph 12.8 to read:

C1, C2 and C3 tyres that were manufactured prior to the dates set out in paragraphs 12.4, 12.5, 12.6 and 12.7 and which do not comply with the requirements of current regulation may be sold for a period not exceeding 30 months from those dates."

Paragraph 14.2, amend to read:

14.2. A list of tread-pattern designations: Specify for each trademark or brand name and trade description the list of tyre size designations, adding in case of Class C1 tyres the mark "**REINFORCED**" reinforced (or "**EXTRA LOAD**" extra-load) or the speed symbol of snow tyres or in the case of tyres of Classes C2 and C3, the mark "**TRACTION**" traction, if so required by paragraph 3.1. of this Regulation.

Annex 2 – Appendix 1, title, amend to read :

"Approval marks in accordance with Regulation No. 117"

Annex 2 – Appendix 2, title, amend to read :

Approval according to Regulation No. 117 coincident with approval to Regulations Nos. 30 or 54 1/

Annex 7 – Paragraph 3.2.1, amend to read

"For every candidate tyre and the standard reference tyre, ABS-braking test runs shall be repeated a minimum of 6 times.

The zones where ABS-braking is fully applied shall not overlap.

When a new set of tyres is tested, the runs are performed after shifting aside the vehicle trajectory in order not to brake on the tracks of the previous tyre, as sketched on Figure A7.1.

When it is no longer possible not to overlap full ABS-braking zones, the test course shall be re-groomed.

Figure A7.1

		braking n°:	1	2	3	4	5	6	7	8
SRTT ⁽¹⁾	starting zone	€	€	€	€	€	€	€	---	---
Cand.1		€	€	€	€	€	€	€	---	---
Cand.2		€	€	€	€	€	€	€	---	---
SRTT ⁽²⁾		€	€	€	€	€	€	€	---	---

Typical sequence:

6 repeats SRTT, then shift aside to test next tyre on fresh surface
6 repeats Candidate 1, then shift aside
6 repeats Candidate 2, then shift aside
6 repeats SRTT, then shift aside"

Annex 7 – Appendix 1, title, amend to read :

**PICTOGRAM DEFINITION OF
"ALPINE" SYMBOL
~~"3-PEAK-MOUNTAIN-WITH-SNOWFLAKE"~~**

B. General comments on annexes 6, 8 and 9:

In Europe have entered into force two Regulations; one is the General Safety Regulation 661/2009 (GSR), fixing for ex. performance thresholds level for tyre/road noise, wet grip and rolling resistance, and the Tyre Labeling Regulation 1222/2009, fixing a consumer information system for end users on the same performances regulated in the previous mentioned GSR.

The intention of the European Commission is to make the GSR prescription operative through reference to UNECE Regulations for type approval purpose; while the Tyre Labeling Reg. is referring to UNECE Regulation 117 mainly to the test methods to be used for self-certification of the performance levels required by the labeling scheme.

- As requested by the EC to transpose the GSR 661/2009 (annex II part B) into UNECE Reg., the ISO28580 was included in the initial proposal of amendment to UNECE R 117 (STD 02-02 of 31.8.09 on UNECE web site)
 - Harmonization with ISO28580 is needed because European Union, USA and Japan refer to this standard in their regulations for labeling of tyres. Moreover, rolling resistance coefficients (RRC), as defined and measured in ISO28580, are also needed for verifying compliance to the European Union Regulations for CO2 emission.
 - ETRTO understands the concern of some CPs, that were attending the ad-hoc GRB-GRRF working group, about the reference laboratory as defined in ISO 28580 and their preference to refer to assigned consensus values agreed by the Technical Services through an inter-laboratory comparison (indicated also as "virtual laboratory") managed by a Technical Support Group (TSG) of UNECE/WP29 as proposed by France.
 - ETRTO considers that this concern can be properly addressed also in the actual ISO 28580; in fact it is not mentioned in ISO 28580 that the reference laboratory must be a physical lab. Moreover, if a country is using a physical lab as reference, it can always be integrated in the inter-laboratory comparison procedure managed by the TSG. If needed, the ISO 28580 could be reviewed via an amendment to include this method proposed by France based on assigned consensus values agreed by the Technical Services through an inter-laboratory comparison (virtual laboratory).
 - As already indicated in the above introduction, the EU Tyre Labeling Reg. is referring to UNECE R 117 mainly to the test methods to be used for self-certification of the performance levels required by the labeling scheme. For this purpose only, the EC proposed in their working document that annexes 8 and 9 are introduced into UNECE R117 as informative.
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- In addition to the inter-laboratory comparison procedure proposed by EC, the content of annexes 8 and 9 is not in line with ISO28580 for sigma "m" and number of tyres for alignment.
- ETRTO considers that those annexes should remain in line with ISO for the value of sigma "m" for candidate machines and the sigma "m" for the Technical Service (TS) according to ISO must be added in annex 8.
- As per the number of tyres for alignment, ISO 28580 is today the reference. Any further revision of technical prescriptions should also be done in the framework of ISO for the purpose of having a world wide harmonized reference for the Tyre Industry and CPs.
