<u>Additional Comments from India on the GTR for Passenger Vehicle Tyres under formulation by the Working Group on Tyres</u>

Giving below our comments on Tyre Document gtr-12-01e after September 16, 2011 meeting, Harmonized provisions concerning pneumatic tyres for passenger and light truck (commercial) vehicles.

Clause 3.19 High speed performance test for LT/C tyres.

Comments Tyre conditioning (if there is change in Inflation pressure) before testing.(Ref-3.19.2.3 of gtr-12-01e)

Justification Test procedure of FMVSS139 for High Speed performance says "If loss of air exceeds 14 kPa (2 psi)

during the conditioning period, determine cause, correct if possible, and recycle tire through the conditioning period" Ref: TIRE CONDITIONING (S6.2.1.1.2 and S6.2.1.1.3) -

but the same not covered in gtr.

Clause 3.8.2.2 and 3.8.2.3

Comments Ref Test numbers IEC 60651 1979/A1:1993 and IEC 60942:1988 to be verified for the latest version(tyre

gtr-12-01e)

Justification These are the test methods established by International Electro-technical Commission for calibrating

sound measuring instruments. Test numbers to be verified for the latest version for e.g.: Test number

IEC 60651 has been replaced by IEC 61672-1 ed 1.

Clause 3.13

Comments "The tyre does not exhibit a change in the deflected section height ,compared to the deflected section

height at the start of the test ,higher than 20 percent"

Justification The term "-higher than 20 percent" creates confusion, to simplify the term, it may be written as follows

"The difference between the deflected section height measured after the test and the deflected section

height measured at the start of the test should not be more than 20 percent".

Clause 3.14

Comments Inflation Pressure : Inflate it to the pressure corresponding to the maximum load, or maximum dual load

where there is both a single and dual load marked on tyre.

Justification Test procedure of FMVSS 119 says "Use the single maximum load value when the tire is marked with

both single and dual maximum loads". This needs to be verified.

Clause 3.2 - Markings

Comments Markings for Asymmetric tyres and Directional tyres to be included in the marking requirements.

Justification For Asymmetric tyre – the outboard sidewall or tire facing outside should be marked otherwise the expected benefits of Asymmetric tyres cannot be achieved, if fitted other way.

For Directional tyres – the direction of rotation marking should be marked on the Outboard sidewall otherwise the expected traction and benefits of directional tyres cannot be achieved.

Clause 3.11 (3.11.2 & 3.11.4)

Comments Preparation of tyres with speed symbols "S" and below, excluding "H" & Preparing of tyres with speed symbols "T" and above, including "H" – creates confusion can be simplified.

Justification In order to avoid confusion the sentence can be reframed as "Preparation of tyres with speed rating 180 km/h and below" and "Preparation of tyres with speed rating 190 km/h and above"

Page 2 of 2