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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

World Forum for Harmonization of Vehicle Regulations (WP.29)

Working Party on Brakes and Running Gear (GRRF)  
(Fifty-third session, 3-7 February 2003,  
agenda item 6.4.)

PROPOSAL FOR DRAFT AMENDMENT TO REGULATION No. 54

(Pneumatic tyres for commercial vehicles)

Transmitted by the Expert from the United Kingdom

Note: The text reproduced below was prepared by the expert from the United Kingdom in order to propose amendments to Regulation No. 54 with regard to subsequent retreading in accordance with Regulation No. 109.

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Note: This document is distributed to the Experts on Brakes and Running Gear only.

**A. PROPOSAL**

The list of contents, the annexes, add a new annex 9 to read:

Annex 9 - COMMUNICATION, Upgrade of Service Description for the purposes of retreading  
in accordance with Regulation No. 109

The text of the Regulation,

Insert a new paragraph 5.7., to read:

"5.7. Subsequent retreading in accordance with Regulation No. 109.

In the case where, during the course of production of a particular tyre, the manufacturer has obtained an extension to the approval, or obtained a new approval, for that tyre to be marked with a service description indicating a higher load index or different speed symbol than the earlier marking and where the tyre manufacturer authorizes the earlier tyre to be retreaded and marked with the later service description, the tyre manufacturer shall complete the Communication document given in annex 9 to this Regulation and shall submit this to the type approval authority that has granted the extension or new approval.

The type approval authority shall communicate this information to other Parties to the Agreement which apply this Regulation and tyre manufacturers or type approval authorities shall release this information on the request of any retreading production unit that is approved in accordance with Regulation No. 109."

Insert a new Annex 9, to read:

"Annex 9

COMMUNICATION

Upgrade of Service Description for the purposes of retreading  
in accordance with Regulation No. 109

(Maximum format: A4 [210 x 297mm])

Issued by (Name and Address of Tyre Manufacturer): .....  
.....  
.....

Declaration:

The tyre corresponding to the following details has been approved, or has received an extension to the original approval, to operate at a higher service description than that of the tyre originally approved. It is therefore permitted for a tyre bearing the original service description to be retreaded to the upgraded service description.

It is also agreed that this information may be released by an approval authority to any retreading production unit that is approved in accordance with Regulation No. 109.

1. Manufacturer's name or trade mark on the tyre: .....
2. Manufacturer's tyre type, model or design designation: .....
3. Tyre Size designation: .....
- 3.1. Category of Use (Normal, Snow or Special): .....
4. Service Description
  - 4.1. Original tyre:  
Approval No. Pursuant to Regulation No. 54. ....  
Granted by: .....
  - 4.2. Upgraded tyre:  
Approval No./Extension No. Pursuant to Regulation No. 54. ....  
Granted by: .....
5. Authorised by (tyre manufacturer's representative):
  - 5.1. Name (Block capitals): .....
  - 5.2. Department: .....
  - 5.3. Signature: .....

**B. JUSTIFICATION**

Paragraph 6.4.9. of Regulation No. 109 does not permit an increase in the service description of a tyre unless the tyre manufacturer has been granted approval for the existing new tyre to be upgraded to a higher service description. This latter stipulation was added because of long-standing experience that moderate upgrading had been practised for many years. The United Kingdom is aware that upgrading of a new tyre should be accompanied by a new approval number but it is unclear whether this requirement is always followed.

In Informal document No. 9, presented to the fifty-first session of GRRF, BIPAVÉR gave an example of a tyre size designation 205/75 R 17.5 that had been in production for some time with a service description 123/121 M. Changes to the specification of the vehicle to which this tyre was fitted as original equipment required a service description of 124/122 M and the service replacement tyre market demand, including retread tyres, changed immediately to the higher specification for both old and new vehicles. There was not any demand for the earlier tyre and the time scale in which retreaded tyres to the higher service description became available from the new tyre manufacturer's retreading plants indicated to the industry that the earlier version tyre was being upgraded. However, attempts to substantiate this using the procedure quoted in paragraph 6.4.9. of Regulation No. 109 were unsuccessful, and the retreading industry, outside of the original new tyre manufacturer, was unable to obtain the information to convince the type approval authorities that they could also upgrade the service description of a particular tyre.

The alternatives are either to prohibit anyone from upgrading a service description, and to enforce this more effectively through Conformity of Production checks, or to ensure a more open and transparent approach as suggested in these proposals. Unfortunately, there is an undesirable third way, being for industry, including the new tyre industry, to ignore the prescriptions of paragraph 6.4.9. and upgrade where it felt justified. To stick rigidly to a "no upgrading" approach, properly monitored, would result in a large number of usable tyres that must be consigned to disposal as scrap, together with a shortage in the availability of suitable retreaded tyres in the market place.

At the fifty-first session of GRRF, the United Kingdom offered to draft a possible solution to the problem and the proposals are given above.

If adopted, the proposal would also require a small amendment to Regulation No. 109 to amend the final sentence of paragraph 6.4.9. to read:

Regulation No. 109,

Paragraph 6.4.9., amend to read:

" .....

.....

The standard form shown in annex 9 to Regulation No. 54 ....."

