

Subject: Comments on the document ECE/TRANS/WP.29/GRRF/2002/17/Rev.7

ETRTO maintains its position as expressed in document reference ECE/TRANS/WP.29/GRRF/2006/23 of 10 July 2006.

TPMS, in particular RFWS, are not meant for comfort but for safety. The driver must be alerted when a "RF" tyre is losing air in order to reduce vehicle speed to the RF tyres' regulated max speed of 80km/h. Moreover, considering the 20min period before warning the driver, a vehicle running at 100km/h will have already use more than 30km of the 80km potential of a RF tyres, so almost half (!) of its potential running distance approved by UNECE Reg.30 in run flat running mode.

TPMS, or RFWS, should be able to operate at any driving conditions, specially in the worse case conditions, avoiding the case of having a driver in worse case condition not be alerted while an other driver in more safety driving conditions will be!.

For the EU market this condition can be seen as a consequence of DIR 2001/95/EC on general safety of products, Article 2, (b). (*...reasonably foreseeable conditions of use including duration ...*). Note that Article 2 (b) (ii) of Dir 2001/95 will apply to the RFWS. (*...effect on other products, where it is reasonably foreseeable that it will be used with other products ;...*)

One of those foreseeable conditions corresponds to the following:  
high speed driving on European motorways, especially in countries where there is no speed limitation, with a leaking run-flat tyre, whereas it has been demonstrated experimentally that such a tyre may fail in less than 5 minutes for certain high speed and low pressure combinations.

Ref. par. 5.1.3: actually all type of temporary use spare unit are requested to have a design speed of at least 120km/h, so we don't see the need to specify it only for type 1, 2 and 3; type 4 normal tyre and type 5 RF system will be always above 120km/h.

Consequently, ETRTO is insisting that the above comments are considered in the amendment of the UK Proposal ref. ECE/TRANS/WP.29/GRRF/2002/17/Rev.7.

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