

**OICA comments on the presentation of TNO Interim Report in June 2010
about the monitoring data for the new type approval test method in ECE R51.**

Due to the very short time period the OICA comments refer to the most important questions and findings. However a detailed analysis with comments will follow.

Many elements of the TNO report appear to be based on generic assumptions. TNO is asked to comprise into their analysis findings from formerly carried out and widely accepted studies on the same subject.

About the analysis of the monitoring data:

1. The number of data delivered by type approval authorities derivates significantly from the number of analyzed data. Why have data been added while others (like CVT) were disregarded? Why was website research used instead direct communication with the approval authority in charge or the manufacturer? Will data delivered after 11/2009 taken into account?
2. Former studies indicate that the correlation between both methods is limited. As a general trend method B will result in lower values for M1/N1 vehicles, but can be unpredictable for other vehicle classes. The scatter between both methods is rather high. OICA strongly requests TNO to investigate more in details the technical reasons for difference.
3. TNO based the elaboration of their limit scenarios mainly on the assumption of a strong link between the two regulations ECE R117 and ECE R51.
 - a. Other studies do not support this conclusion. Can TNO give a comprehensive explanation why these two regulations should correlate?
 - b. The introduction of the new limit values for tyres from 1. Nov 2016 for all vehicle types will have a very limited impact on OEM tyres and vehicle type approval, because for M1/N1 vehicles low noise tyres are already today widely used in vehicle production.
 - c. For other vehicle categories the influence of the tyre regulation is unpredictable because of the high variability of tread designs that can be chosen by the customer depending on his particular requirement for use.
4. All options for limit values and time frames do not take the industrial burden into consideration nor the practice in terms of lead time and stability in the field of environmental regulations.
 - a. Based on the agreed best practise for future regulations, the introduction of the new test method need a minimum lead time after entry into force.
 - b. Option 3 as “easy achievable goal“ is not seen by vehicle manufacturers as the “equivalence” to the current requirements, due to the already mentioned scattered data. The re-definition of vehicle classes will cause further difficulties.
 - c. There is no technical basis for the assumption that vehicles could “easily be adapted” to the new method. Thus even with Option 3 some vehicle types will need substantive technical changes, which require development time and money.
 - d. The option 5 with limit reductions in a two year interval does not provide an adequate period of product stability to allow manufacturers to reach a return on investment.

About the analysis of the social impact:

1. The calculated social benefit does not correlate to other studies, where similar parameters were taken into account.
2. Benefits were assumed also on the performance of tyres which have already been incorporated in the new limit standards for the tyres. How will TNO cover this aspect?
3. The TNO cost estimation for industry is based on a linear cost per decibel model. Costs and technical difficulties will raise rather exponentially and are highly dependent on the available lead-time for implementation. TNO is asked to review the cost model.
4. Why did no manufacturer consultation take place before the disclosure of conclusions on the appropriate options for further regulations?
5. Will TNO assess the negative impacts from/on other regulatory requirements?
6. Will TNO assess alternative noise reduction measures and compare their benefits against the limit reductions for vehicles?
