

REGULATION No. 117  
(Tyres rolling noise and wet grip adhesion)

Proposal for amendment to ECE/TRANS/WP.29/GRB/2010/3

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

A. PROPOSAL

“ANNEX 6 Paragraph 6.5.”, amend to read:

~~0.075~~N/kN for Class C1 and C2 tyres  
~~0.06~~ N/kN for Class C3 tyres

“ANNEX 6 Paragraph 6.6.”, amend to read:

this ~~one~~ month period,  
a given ~~one~~ - month period,  
from ~~one~~ monthly evaluation

Insert a new “ANNEX 8” attached, to read:

**Annex 8**

~~{informative}~~

**PROCEDURE FOR TECHNICAL SERVICES INTER-LABORATORY COMPARISON**

**1. General**

**This clause describes the procedure to be followed to perform inter-laboratory comparison in order to define a reference lab composed by multiple Technical Service laboratory machines for the purpose of Annex 9. It can be used for determination of assigned values (see § 3) for a set of alignment tyres.**

**This machines alignment procedure requires two predetermined alignment tyres of the same sizes used by the candidate laboratory (Annex 9) operating the machine. The same physical set of these tyres is used to align several Technical Service machines by comparing the measured Cr results among each Technical Service. A Technical Services inter-laboratory alignment formula is then established and shall be used to translate the results obtained on different Technical Services machines into aligned**

results of each Technical Services, in order to provide assigned values to candidate machines when aligning with one Technical Service.

## **2. Conditions for Technical Services machines.**

Every Technical Service machine participating to the inter-laboratory comparison must also be in accordance with this Regulation Annex 6.

**2.1 Monitoring of the reference machine laboratory control tyre shall be carried out at intervals no greater than one month. Monitoring shall include a minimum of three separate measurements taken during this one month period. The average of the three measurements taken during a given one-month period shall be evaluated for drift from one monthly evaluation to another.**

**2.2 The laboratory shall ensure that, based on a minimum of three measurements, the reference machine maintains a value of  $\sigma_m \leq 0.05$  N/kN. This may be done using the laboratory control tyres (as specified in 2.1).**

**2.3 The assigned value for each alignment tyre is the general average of the results obtained by all Technical Service for this alignment tyre in this inter-laboratory comparison.**

## **3. Alignment Tyre Requirements**

- a. The predetermined alignment tyres used to conduct the alignment procedure shall be identified to cover the needed usage range in terms of load index, Cr and Fr as follows:**
  - **Cr values shall have a minimum range of:**
    - 3 N/kN for tyres with LI=121 and below
    - 2 N/kN for tyres with LI=122 and above.
  - **The alignment tyre section width should be:**
    - $\leq 245$  mm for machines for tyres with LI=121 and below
    - $\leq 345$  mm for machines for tyres with LI=122 and above.
  - **The alignment tyre outer diameter should be**
    - between 510 to 800 mm for Class C1 and C2 machines
    - between 771 to 1143 mm for Class C3 machines
  - **load index values shall adequately cover the range for the tyres to be tested, ensuring that the Fr values also cover the range for the tyres to be tested.**
  - **the number of alignment tyres shall be equal to:**
    - two alignment tyres for Class C1 and C2 tyres, and

- two alignment tyres for Class C3 tyres.

- b. Each alignment tyre must be checked prior to use and replaced when:
- it shows a condition which makes it unusable for further tests
  - there are deviations of Cr for alignment tyre measurement greater than 1.5% relative to earlier measurements after correction for any machine drift.

#### 4. Alignment Procedure

- a. Each time an alignment tyre is measured, the tyre/wheel assembly shall be removed from the machine and the entire test procedure specified in section 4 of Annex 6 shall be followed again.
- b. A sequence of all Technical Service laboratories willing to be part of the inter-laboratory comparison for the definition of the reference laboratory is established. Each Technical Service laboratory, shall measure each alignment tyre three times in accordance with section 4 of Annex 6 and applying the conditions in section 3 of Annex 6, provide the mean value and standard deviation established from the 3 measurements for each tyre, to the next Technical Service laboratory in the sequence.
- c. The measurement standard deviation  $\sigma_m$  calculated using two alignment tyres shall be ensured
- not greater than 0.05 N/kN for tyres with LI=121 and below
  - not greater than 0.05 N/kN for tyres with LI=122 and above.

#### 5. Comparison regression definition

N Technical Services measure two alignment tyres of the same sizes of those used in Annex 8. The average value of each tyre is taken as reference value.

Then, calling the average value of the j-th tyre  $RRC_{ave_j}$

$$RRC_{ave_j} = \frac{\sum_{i=1}^N RRC_{ij}}{N}$$

where  $RRC_{ij}$  is the RRC value of the j-th tyre measured by the i-th laboratory.

j is either 1 or 2, corresponding to each of the alignment tyres.

Each Technical Service then correlates its measurements with the average values.

The correlation shall be performed using a liner regression technique, A1 and B1, given in the equation:

$$Cr_{ass\_TS} = A1 \times Cr\_TS_i + B1 \quad (2)$$

Where:

- $Cr_{ass\_TS}$  is the assigned value of the Rolling Resistance Coefficient to the Technical service including temperature and drum diameter influences.

- **Cr<sub>TS<sub>i</sub></sub>** is the measured value of the rolling resistance coefficient by the Technical service including temperature and drum diameter influences.
- **The aligned Cr value for the Technical Service must take into account coefficients A1 and B1 : when a candidate lab is requesting to perform the alignment to a Technical Service laboratory within the inter-laboratory sequence list, the issued value by the contacted Technical Service laboratory shall be corrected as above to represent the reference laboratory being defined by all the Technical Service laboratories in the list**

The measurement standard deviation estimate,  $\sigma_m$ , shall also be given.

6. **The alignment process must be repeated at least every two years and after any significant machine change or any drift in candidate machine control tyre monitoring data, by each Technical Service laboratory in the list.**

“ANNEX 9” Title, amend to read:  
[(informative)] should be deleted.

“ANNEX 9 Paragraph 1.1.”, amend to read:  
Set of ~~{1-5}~~ **two** predetermined tyres

“ANNEX 9 Paragraph 2.2.”, amend to read:  
~~{1-5}~~ **two** predetermined alignment tyres

“ANNEX 9 Paragraph 4.1. (a)”, amend to read:  
~~{3 N/kN}~~for Class C1 and C2 tyres, and  
~~{2 N/kN}~~for Class C3 tyres.

“ANNEX 9 Paragraph 4.1.”, amend to read:  
**Two** alignment tyres for Class C1 and C2 tyres, and  
**Two** alignment tyres for Class C3 tyres.

“ANNEX 9 Paragraph 5.3.”, amend to read:  
(a) not greater than **0.075** N/kN for Class C1 and C2 tyres, and  
(b) not greater than **0.06** N/kN for Class C3 tyres.

$\gamma=$ **0.043** N/kN for for Class C1 and C2 tyres, and  
 $\gamma=$ **0.035** N/kN for Class C3 tyres.

## B. JUSTIFICATION

Regarding the amendment of R117 currently being proposed, Japan basically believes that amendments to the regulation should be developed from the standpoint of international harmonization of vehicle and parts regulations, which is the objective of the UN/ECE Regulations.

In particular, the introduction of rolling resistance requirements and test methods proposed by EC in their draft amendments to R117 (Annexes 6, 8, and 9) is also scheduled to be adopted in the tyre grt, which is currently being discussed at GRRF.

Standard ISO 28580, which was developed for the purpose of international standardization of the rolling resistance test, has already been scheduled to be introduced into Japanese and the U.S. regulations. It has also been adopted in the EC Regulation (EC) No 661/2009, which has already been in effect.

Hence, from the standpoint of international harmonization of regulations, Japan believes that amendments to R117 should also be developed in line with standard ISO 28580. It is the desirable direction for it as an ECE Regulation.

The EC document has proposed to use test methods based on standard ISO 28580, which allows four measurement methods. We can see that this basic concept is incorporated in the proposal. However, there are some concerns regarding adopting and implementing the EC proposal.

Accordingly, based on the belief that the current amendment of R117 should be in accord with standard ISO 28580 from the standpoint of international harmonization of regulations, Japan proposes to make the following changes to Annexes 6, 8, and 9 in the EC proposal so that there will be no difference between Contracting Parties in the way they handle type approvals:

The EC proposal contains the provisions on technical services inter-laboratory comparison testing and machine alignment so as to minimize variances in the measurement results between technical services. Although Japan supports this idea, the alignment procedures in the EC proposal seem too general, which would make it difficult for Contracting Parties to conduct such testing. For this reason, from the said standpoint of international harmonization of regulations and implementation of this regulation, Japan proposes to change Annex 8 "PROCEDURE FOR TECHNICAL SERVICES INTER-LABORATORY COMPARISON" by adopting standard ISO 28580 and providing steps for making comparisons between technical services approved by different Contracting Parties.

Further, Japan believes it necessary to delete [informative] in Annexes 8 and 9 and change them to mandatory requirements and to harmonize the provisions in Annex 6 "TEST PROCEDURE FOR MEASURING ROLLING RESISTANCE" and Annex 9 "PROCEDURE FOR MEASUREMENT MACHINES ALIGNMENT AND MONITORING REQUIREMENTS" with standard ISO 28580.

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