Working Paper N°: TYREgtr-11-06 (Comments from China on Tyre Document gtr-11-02)

PROPOSAL FOR AMENDMENTS TO TIRE GTR-11-02-e

<u>Note</u>: The text reproduced below has been prepared by the experts from the People's Republic of China in order to improve the GTR draft. The modifications to the existing text of the GTR draft are marked in **bold italic** characters. Some general comments are also included.

A. Scope

PROPOSAL:

Paragraph 1, amends to read:

1. SCOPE

This global technical regulation covers new radial pneumatic tires of Class 1 and Class 2 designed primarily for vehicles in category 1 and 2, all with a mass limit of 4,536 kg, as defined in the Special Resolution Number 1 paragraph 2.

JUSTIFICATION:

In actual application, it's very common that identical tires are fitted on vehicles of different masses or vehicles of the same mass are equipped with different sizes of tires. Therefore it is inappropriate to categorize scope by vehicle mass which will result in an inexplicit definition of tire scope. Since definitions of tire classes in section 2 of this GTR is clear and accurate. Therefore, China propose to remove the restriction on vehicle mass mentioned in the scope.

In addition, deleting mass limit means the extension of the GTR scope which does not prevent the CPs from narrowing the scope in their territories by limiting the vehicle mass in their own standards or regulations.

B. Tire Wet Grip Test

PROPOSAL:

Paragraph 3.12.1, amends to read:

3.12.1 Requirements

Passenger tires (Class C1 tires) shall meet the following requirements:

Contracting Parties may choose at their discretions to mandate the following requirements for passenger tires (Class C1 tires):

JUSTIFICATION:

As we have suggested in the previous meetings, wet grip test has not been adopted widely enough to mandate it by all Contracting parties. The harmonized GTR should consider the different situations of Contracting Parties. It is a proper solution to allow the Contracting Parties at their own discretions to mandate the Wet Grip Index (G) limits. The wet grip test and corresponding performance requirements should be optional.

C. Height of Tire size designation PROPOSAL:

Paragraph 3.3.1.2.3, amends to read:

3.3.1.2.3 The tire size designation in characters not less than 6 mm high *in at least one place on the sidewall* comprising:

JUSTIFICATION:

The above proposal is based on the fact that the tire size marking on some tires is written more than once on a sidewall.

D. The requirement of speed mark on tire sidewall for "ZR' tire

3.3.2. For tires suitable for speed in excess of 300 km/h, the letter "R" placed in front of the rim diameter code symbol marking shall be replaced by **the rated speed limit** "ZR" and the tire shall be marked, in parentheses, with a service description consisting of the speed symbol "Y" and a corresponding load index, for example, 245/45ZR17 (95 Y). Note: the actual maximum tire load capacity and speed capability shall be stated in the tire manufacturer's technical literature and made available to the public.

E. Test temperatures

The test temperatures in paragraph 3.9.2.1, 3.9.3.2, 3.10.3.5, 3.11.2.2, 3.11.3.6 and 3.11.5.4 should all be changed to 38°C±3°C as specified in 3.13.2.2 because the test equipments and conditions for these tests are all similar.

F. General comments on test load for high speed performance test PROPOSAL:

Paragraph 3.5.6.1.1, amends to read:

3.5.6.1.1 The tire overall width may exceed the section width defined in paragraph 3.5.3 above by the following percentages:

in radial and run flat tires: ±4%

JUSTIFICATION:

It is reasonable to specify a lower limit as well as an upper limit for difference between the tire overall width and the section width.

G. General comments on test load for high speed performance test

The word "optional" in 3.3.13.1 should be changed to "mandatory" [LT marking for tires with a load index < 121] and the word "mandatory" in 3.3.13.2 should be changed to "optional" [LT marking for any load index > 122].

H. Test pressure for strength test and unseat test

The specified inflation pressures for strength test in paragraph 3.6.2.1 and bead unseat test in paragraph 3.7.2.1 should be harmonized with the pressures for standard load and extra load for endurance test specified in paragraph 3.9.2(shown below).

Endurance Test Tire Inflation Pressures	Tire Application	Test Pressure (kPa)
	Standard Load, Light Load	180
	Reinforced or Extra Load	220

I. Height of Tire Identification Number PROPOSAL:

Paragraph 3.2.1.1, amends to read:

3.2.1.1. The height of the tire identification number shall not less than [x]mm and the "_" is a space of not less than 6 mm not greater than 19 mm.

JUSTIFICATION:

To be consistent and conspicous, a lower limit for the molded height of the tire identification number should be specified.

J. Snow tire for use in severe snow conditions (Paragraph 2) PROPOSAL:

The definition in the current draft GTR is inexplicit and cannot distinguish snow tire and snow tire for use in severe snow conditions by tire performance. We propose to adopt the definition specified in FMVSS 139.