

Additional Comments from India on the GTR for Passenger Vehicle Tyres under formulation by the Working Group on Tyres

Giving below our comments on **Tyre Document gtr-11-02e after 1st February meeting**, Harmonised provisions concerning pneumatic tyres for passenger and light truck (commercial) vehicles.

Clause 1 Scope

Comments Special resolution no.1.1
Justification Give reference to Special Resolution No.1.1/ for which another document has to be referred to.

Clause 2 Definitions

Comments Class C2 & C3 tyre definition
Justification Under definition of Class C2 & Class C3 tyres all speed symbols from F to P2 are specified for load index = 121. For class 3 tyres having load index = no speed symbol is specified. It would be better to add all speed symbols.

Comments Light Load is appearing under definitions and in many other places in the document.
Justification To our knowledge, light load category is applicable to Motorcycle tyres only. The relevance of this category to passenger and commercial vehicle tyres are to be re-confirmed.

Comments Snow tyre and snow tyre for use in severe snow conditions
Justification The definitions given are not clearly distinguishing the difference between the two as well as the qualification criteria for M+S mark.

The two categories will lead to confusion in the customers mind to take purchase decision. Which one is acceptable by the law in case of countries where snow tyres are mandatory? Incidentally, FMVSS has only one category which meets 'alpine marking'

Clause 3.3.1.2.3.4 Add Load range for LT/C tyres

Comments Load range should not be included in tyre sidewall marking
Justification Load range like Ply Rating may be discarded in favour of universally accepted Load Index.

Clause 3.3.7 Tubetype marking

Comments The word "Tubeless" also to be added inline with suggested "Tube type" marking because the tyres are to be marked as per application
Justification In some countries, where both tube type and tubeless markings are prevalent, the tubeless marking is mandatory and not tube type. This situation is expected to continue, especially in commercial sector.

Clause 3.3.11 PSI for LT/C tyre

Comments Why "PSI" index marking needs to be marked on the sidewall LT or C type tyres, which is indication of the inflation pressure to be adopted for the load/speed endurance tests.

Justification When there is no such requirement for any other category? The same method can be adopted for LT/C category of tyre and the table indicating the pressure to be adopted for load/speed endurance tests should suffice.

Clause 3.3.13.1 For C type tyre

Comments Why make the marking C or LT optional for tyre going on 5⁰ drop centre rim?

Justification It may cause confusion with passenger tyres of the same size.

Clause 3.6.2.1 Strength test procedure

Comments Mount the tyre on the test rim & inflate it to the test inflation pressure specified in the table : "In the table test inflation pressure to be kept on the basis of inflation pressure marked on tyre". Instead of this it should be kept as per standard load / light load tyre & Extra load tyre only.

Justification For bring clarity, test inflation pressure should be similar to clause 3.6.1 and should be 180 kPa for Standard / Light Load tyre and 220 kPa for Extra Load tyre

Clause 3.7.2.2 Bead Unseating resistance test

Comments Inflate it to the test inflation pressure specified in the table : "In the table test inflation pressure to be kept on the basis of inflation pressure marked on tyre". Instead of this it should be kept as per standard load / light load tyre & Extra load tyre only.

Justification For bring clarity, test inflation pressure should be similar to clause stated above and should be 180 kPa for Standard / Light Load tyre and 220 kPa for Extra Load tyre

Clause 3.8 Rolling Sound

Proposed change Rolling sound limits to be kept as per 09-02e draft proposals which are as per 2012 ECE regulation limits

Justification The limits proposed in the subject documents are the limits proposed for 2016 by ECE.

Clause 3.14 Strength test for LT/C tyres

Clause 3.14.1 & 2 Requirements & preparation of tyre

Proposed change Mount the tire on a model rim assembly and inflate it to the pressure corresponding to the maximum load, or maximum dual load where there is both a single and dual load marked on the tire. If the tire is tubeless, a tube may be inserted to prevent loss of air during the test in the event of puncture.

Justification Tables shown that are for passenger car tyre and not meant for LT/C category (Ref FMVSS 109)

Clause 3.14 Strength test for LT/C tyres Table

Proposed change In the plunger table remove the words “All Motorcycle tyres”

Justification This regulation is not applicable for this category of tyre.

Clause 3.17, 3.18 & 3.19 Endurance test, Low inflation pressure & Hi-speed performance test as per FMVSS 139

Proposed change Earlier also India had raised this issue of testing speed mis-match for LT/C category of tyre having “M” and below speed rating

Justification The test speeds requirements may not match for tyre having speed rating “M” and below

Additional comments

Proposed Following are the Suggestions to include –

A) Provision in the document concerning modality of change of any test method, just in case,

B) No mention on the mechanism of Conformity of Production..