



**European Tyre and Rim Technical Organisation**

TAL 029-03-ETR-GRRF-REG54

**Ref : doc TRANS/WP.29/GRRF/2003/2 (Draft proposal to amend regulation ECE 54)**

ETRTO does not agree with the proposal submitted in the above mentioned document as the content of it has nothing to do with the scope of ECE regulation 54.

In fact Item 2.1 of ECE regulation 54 defines the 'type' which includes, amongst other characteristics, the 'Load capacity indices' (see item 2.1.6). Moreover Item 5.2 of the same regulation specifies that: "An approval number shall be assigned to each type approved; ..... The same Contracting Party may not assign the same number to another type of pneumatic tyre."

Thus, as prescribed by ECE Regulation 54, two type approvals for tyres having the same size designation, but differing as far as the 'Load Capacities Indices' are concerned, cannot have the same approval number and therefore cannot be the object of an extension of the same type approval.

This proves that the prerequisite for the proposed amendment to ECE regulation 54 is out of scope.

What happens in practice is the following.

After request from a vehicle manufacturer for an increase in load carrying capacity of a given tyre size, the tyre manufacturer starts a test program to verify whether:

- a) a given tyre type's manufacturing specification is sufficiently robust to allow it, or
- b) an up-grade of the manufacturing specification is necessary to permit the higher load carrying capacity.

In both cases therefore the tyre manufacturer will request the type approval authority for a new 'type approval number'.

No additional information whatsoever shall be specified, according to regulation ECE 54, to justify the changes in the 'service description' for the new tyre type; the only requirement for it is just to pass the test foreseen for the new conditions.

When first retreading his own carcasses the tyre manufacturer may, in case a) above, request the type approval authority (in the frame of regulation 109), and receive a consent for it, for the allowance to upgrade the Load Index for carcasses manufactured, previously of the new type approval, with a lower marking, but having an intrinsic potential for the new performances.



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In that case the duty of information to other independent retreaders is specified in ECE regulation 109 item 6.4.9 under the responsibility of the Approval Authority.

Of course those information shall also specify all relevant technical constraints, as defined by the manufacturer of the 'original, first life' carcass, such as for example: production date codes, production plants, tyre commercial description(s), repairs, etc.

In this sense the last sentence of item 6.4.9 of regulation ECE 109 is not correct, because it wrongly refers to annex 1 of ECE regulation 54, where no information can be found, and does not add all necessary technical information and specifications.

Therefore ETRTO is proposing that GRRF modify as follows the last sentence of item 6.4.9 : 'The standard form shown in annex 9 to this Regulation shall be used to communicate this information.'

To this purpose the proposal of document TRANS/WP.29/GRRF/2003/2, modified as per the attachment, could form the basis for the new annex.

Yours sincerely

Léon Chession  
Secretary General

"Annex 9  
COMMUNICATION

Revision of original tyre type Service Description for the purposes of retreading  
in accordance with Regulation No. 109  
(Maximum format: A4 [210 x 297mm])

Issued by (Name of the administration).....

Declaration:

The tyre type corresponding to the following details was granted an extension to the original type approval, to be retreaded and operate at a 'Service Description' other than that marked on the original, first life, tyre's sidewalls.

It is therefore permitted for any tyre bearing this original type approval number, and conforming to all below specifications, to be retreaded to the authorised 'revised Service Description'.

1. Original Type Approval No. pursuant to Regulation No. 54. ....

1.1 Granted by: .....

1.2. Manufacturer's name(s) or trade mark(s) on the tyre: .....

1.3. Manufacturer's tyre model(s) or design designation(s): .....

1.4. Tyre Size Designation: .....

1.5 .Structure: .....

1.6. Category of Use (Normal, Snow or Special): .....

1.7. Service Description;

1.7.1 Nominal: .....

1.7.2 Additional: .....

2. Authorised revised Service Description:

2.1 Nominal:.....

2.2 Additional: .....

2.3. Technical constraints for the upgrade to the revised Service Description:

.....  
.....  
.....

2.4. Authorised by (tyre manufacturer's representative):

.....

3. Any remarks:

.....

4. Place.....

5. Date.....

6. Signature: .....

This information may be released to any retreading production unit that is approved in accordance with Regulation No. 109.