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## **ECONOMIC COMMISSION FOR EUROPE**

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Working Party on Brakes and Running Gear (GRRF)

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PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 109 (Retreaded pneumatic tyres for commercial vehicles and their trailers)

Submitted by the expert from the European Tyre and Rim Technical Organization (ETRTO)

<u>Note</u>: The text reproduced below was prepared by the expert from ETRTO proposing an increase of the tolerances for the section width of retreaded tyres. It is based on a document without a symbol (informal document No. GRRF-59-08), distributed during the fifty-ninth GRRF session (see report ECE/TRANS/WP.29/GRRF/59, para. 28). The modifications to the existing text of the Regulation are marked in **bold** characters.

Note: This document is distributed to the Experts on Brakes and Running Gear only.

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### A. PROPOSAL

## Paragraph 6.5.4., amend to read:

- "6.5.4. After retreading, the dimensions of the retreaded tyre, when measured in accordance with annex 6 to this Regulation, must conform either to dimensions calculated according to the procedures in paragraph 7. or to those given in Annex 5 to this Regulation. Note **that:** 
  - **the** maximum outer diameter of a retreaded tyre may be up to 1.5 per cent greater than the maximum outer diameter of a new, original tyre permitted by Regulation No. 54;
  - and the maximum section width of a radial retreaded tyre may be up to 1.5 per cent greater than the maximum section width of a new, original, radial tyre permitted by Regulation No. 54."

## Paragraph 7.1.4.2., amend to read:

"7.1.4.2. It may exceed the value by **5.5 per cent** in the case of radial-ply tyres and 8 per cent in the case of diagonal (bias-ply) tyres. However, for tyres with nominal section width exceeding 305 mm intended for dual mounting (twinning), the value determined pursuant to paragraph 7.1.1. above shall not be exceeded by more than **3.5 per cent** for radial-ply tyres with nominal aspect ratio higher than 60 or 4 per cent for diagonal (bias-ply) tyres."

## Annex 5, the text, amend to read:

"Note that with reference to paragraph 6.5.4. of this Regulation, the outer diameter of a retreaded tyre, and the section width of a radial retreaded tyre, may in all cases be greater than that shown in the tables in Annex 5 to Regulation No. 54 but by no more than 1.5 per cent."

### B. JUSTIFICATION

When Regulation No. 109 was elaborated, tolerances for outside diameter were increased over those given in Regulation No. 54 due to the known increase in diameter when a tyre is used. The inevitable growth of the section width during tyre use, was not considered. Consequently, a new tyre that is at the maximum width allowed by Regulation No. 54 would not be retreadable today because the section width tolerances for Regulation No. 109 are identical to those of Regulation No. 54.

To correct this incoherence, ETRTO and ETRMA<sup>1</sup> are proposing to amend Regulation No. 109, in order to allow radial retreaded tyres to be 1.5 per cent wider than the maximum authorized for the same new tyre size in Regulation No. 54. This corresponds to the same increase allowed for the diameter of retreaded tyres with respect to the new tyre.

European Tyre and Rubber manufacturers' association (former Liaison Office of the Rubber Industry of the European Union (BLIC)).

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Logic imposes that Regulation No. 109 be modified to take into account this increase in section width with the use of the tyre, so that the retreading industry will not be penalized. It should be noted that this modification will not actually change the width of retreaded tyres on the market. It simply regularizes a pre-existing but unrecognized condition.

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