

JATMA

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Title: Study on Labeling Requirements of Tyre GTR

1. Purpose and Function of Tyre Markings

The tyre markings to be placed permanently on the tyre sidewall are;

- a) Information to enable users to select appropriate tyres, which meet their purpose of use.
(for example, tyre size, and speed rating)
- b) Information indicating tyre quality (for instance, certification markings such as ECE or DOT Markings)

In addition to the above, to enable countries that have a Recall Act for automobile parts to introduce labeling requirements of tyre GTR as a domestic regulation, the information related to manufacturing to allow traceability of products is necessary. (such as TIN)

2. Status Quo of Tyre Markings

Regarding the current status of tyre markings, many countries in the world have unique provisions for marking contents, stamping method (letter height, depth, letter types and language), and location of markings. (Attachment 1) Therefore, it is inevitable for each tyre manufacturers to follow the contents of markings by different destinations, or place many markings complying with marking requirements for multiple regions or countries.

Furthermore, confusion exists depending on users (or a certain market) owing to needless (meaningless) markings, and what's more, lack of space on the tyre sidewall has become a problem because various kinds of markings are required by each regulation.

3. How to proceed with the study / precept (Attachment 2)

As evident from the purpose and function of tyre markings and analysis of current regulations on tyre markings, the following points will be prerequisite conditions for the improvement of markings.

Tyre markings need to provide users requisite minimum information lucidly satisfying aforementioned purposes, taking into consideration the limited tyre sidewall space and cost.

In addition, conventional marking methods and contents are becoming necessary to be reviewed due to the diversification of tyre sizes, and variation of structure and materials. From these points of view, it is becoming necessary to review the marking items and contents.

- a) Examine current regulations
- b) Study the needs of each marking items, from the perspective of safety, providing adequate information to users, and cost.

Besides, reduce the marking items as much as possible without harming users' convenience.

- c) Also study the following marking requirements, which are becoming less important.
 - 1) In case of current situation for passenger car tyres, tubeless type dominates the market and it may not be necessary to mark “Tubeless”. (It should be marked “tube type” in case of tube type)
 - 2) The majority of the market is radial tyres instead of bias tyres and moreover, “R” is marked in the size designation in case of radial tyres. In this situation, it is not necessary to mark “Radial”. (It should be marked “Bias” in case of bias tyres)
- d) From the viewpoint of intelligible recognition by the users, letter height, depth, letter location, and language should be added to the study.

4. JATMA Proposal

In studying the marking requirements for tyre GTR, JATMA will propose the followings.

- a) GTR marking requirements to be based on GTS2000 marking requirements. In addition to GTS2000, FMVSS109, 139 and ECE R30 will be studied.
- b) The unique requirements from regional circumstances and each country’s regulation will be an issue of study. (for example, rim size marking, and standard number etc.)
- c) Study the necessity of introducing the “GTR Mark” that can be interpreted as a self certification mark.
- d) Country of production marking (example, “Made in Japan”) is a provision in other laws and regulations so it will be exempted from the subject of study.

5. Schedules

JATMA proposes the schedule of this study as follows.

Step 1: Detailed study of the marking requirements for each country’s regulations
- End of April 2007

Step 2: Study of the draft proposal
- End of August 2007 (Report and submission to the GRRF 62nd Session)

Step 3: Preparation of the draft proposal - end of October 2007
Submission of the draft proposal - end of November 2007
(Report and submission to the GRRF 63rd Session)

Step 4: Submission of the final proposal - end of July 2008
(Report and submission to the GRRF 64th Session)