

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

Giving below are the comments in Tyre gtr-05-02e_03-09-08 document.

Clause 2. Scope	
Proposed change	<p>This global technical regulation (gtr) specifies performance, dimensional and marking requirements of new radial passenger car tyres designed primarily for vehicles in categories 1-1 */, **/ with Load Capacity Index up to 125 and speed symbol of F to Y.</p> <p><i>This GTR does not apply to excluding high pressure temporary use spare tyres</i> Passenger car tyres, as used in the above statement, means a tyre specified in the "passenger car tyre" section of one of the international tyre standards.</p> <p>*/ As defined in the special resolution No. 1 Concerning the Common Definitions of Vehicle Categories, Masses and Dimensions (document ECE/TRANS/WP.29/1045/Amend.1)</p> <p>**/ This Regulation defines requirements for tyres as a component. It does not limit their installation on any categories of vehicles."</p>
Justification	<p>The current wording of the clause leads to many interpretations, as the expression passenger car has not been defined in any the documents related to 1998 agreement.</p> <p>Category 1-1 is defined clearly in para 1.1.1. of Annex 2 of SR-1 as</p> <p>"Category 1-1 vehicle" means a category 1 vehicle comprising not more than eight seating positions in addition to the driver's seating position. A category 1-1 vehicle cannot have standing passengers</p> <p>It may be recalled that similar problems were experienced in ECE Regulation Nos. 30, 54, 108 and 109 and the formulation proposed in document no. ECE/TRANS/WP.29/GRRF/2008/4, is coming up for discussion in the 65th session of GRRF.</p> <p>Appendices 1 and 2 give only speed symbols F to Y and Load Capacity Indices up to 125. Even low speed tyres need to be covered as India is forwarded an informal document to cover low speed tyres. Hence the GTR should cover all ranges.</p>
Clause 4.2. Marking (labeling)	
Comments on Clause 4.2.2	<p>Clause 4.2.2 describes the modules and the options. So far the understanding has been that every signatory will permit use of tyres that:</p> <ul style="list-style-type: none"> • Comply with requirements given in the Compulsory Module and • Either Module A or Module B, as chosen by that signatory. <p>The current text of clause 4.2.2 gives an understanding that the signatory has the option to insist on compliance to both of the optional Modules, i.e. the compulsory module and Module A and Module B.</p> <p>It is suggested that to choice of modules "Modules "A" or "B" are optional and shall be decided by the Contracting Party as a separate clause.</p> <p>Our view is that the "Wet Grip Test" should be made Optional & to be placed under "Module B" which is already containing other similar ECE regulations</p>
Justification	<p>The aspect of wet grip is governed by the real "Application" of tyre in a particular</p>

	<p>environment. We know that world over, such tyre application conditions are widely divergent hence the 'Product' must be allowed to be customized to suit such applications. For example the countries having dry climate like Middle East and other countries or regions may want to use a product suitable for dry conditions only. The products containing additional features of predominant wet properties are generally not suited for such applications in view of the compromise it can have on other performance indicators like Wear and Dry Traction.</p>
<p>Comments on Clause 4.2.3, 4.2.4, 4.2.5 & 4.2.5.1</p>	<p>In the case of approval marking for GTR, unlike in the case of E marking, it is necessary that each signatory country needs its approval marking on the tyres. Hence the concept of a Global Marking does not exist for administrative purposes. However, the concept of uniform marking scheme (say G marking) as showing compliance to the GTR is welcome; as otherwise, there will be different types of approval markings mandated by each signatory.</p>
	<p>It is very essential that a code for the signatory who has granted approval is also part of this marking. The suggestion to have the identification of character for signatory country as shown in second para of 4.2.3 is welcome.</p> <p>The concept of identifying the country by a number allotted by UN Secretariat is acceptable. These have to become part of the document as is being now practiced in ECE regulations.</p> <p>However, there is a simpler alternative available. ISO 3166-1:2006 already specifies Alpha-3 Code for all countries. These codes are derived from codes used by UN already. Therefore it is suggested that the alpha-3 code prescribed in ISO 3166 may be used instead of allotting a new set of numbers.</p>
	<p>The purpose of approval marking is only to indicate that the tyre has been approved for compliance to the requirements of this GTR as is needed for easy identification by authorities of each signatory.</p> <p>It is not essential to prescribe additional indication such as:</p> <ul style="list-style-type: none"> • What are the technical requirements opted by the signatory • Whether such requirements are considered for global, regional etc. • Whether the approval is self certification or type approval etc. <p>A marking G_{XXX} will suffice to indicate that all the requirements of the signatory identified by XXX are complied with.</p> <p>To indicate the approvals for each signatory on the tyre, it may become necessary to mark G_{XXX}, G_{YYY}, G_{ZZZ} etc. or G_{XXX,YYY,ZZZ} etc.</p>
<p>4.2.5.2</p>	<p>It will not be possible to mark the type approval reference number on the tyres. Since there is no mutual recognition of approvals as per 1998 agreement, each signatory will have its own approval number. There is no universal approval number envisaged under 1998 agreement.</p> <p>Hence a universal approval number is not feasible.</p> <p>With the induction of the manufacturer's code, it ought to be possible for the signatory to have traceability of the approval, even without the approval number being marked on the tyre. Marking approval number issued by all signatories on the same tyre will be</p>

	impossible to carry out.
4.2.5.4	It is not clear from the text, which parameters are supposed to be covered in this 8 digit manufacturer's code. Does it cover part of the requirements of prescribed in clause 4.2.8 or is it additional ? This point may be discussed and clarified.
Clause 4.9 High Speed Performance Test	
Clause 4.9.3	Clause 4.9.3 describes the Test procedure for tyres with speed symbol "S" and below:
Comments	The test speed schedule are as per FMVSS 139 high speed which calls for 2 hrs break in at 80 km/h speed and then 30 min. consecutive steps at speed of 140,150 & 160 km/h.
Justification	This high speed test will not address tyres with speed symbol below "S" as it will result in exceeding test speed beyond their limit. New test procedure to address these speed rating was already proposed by India group and are under evaluation by ETRTO.(Ref. informal document no. GRRF-64-23 of 16-19 Sept'08) Also an elaborate procedure with 'steps' has been prepared and being shared with ETRTO as an informal document.
Clause 4.10 Tyre Rolling Sound Emission Test	
Clause 4.10.8	For Passenger tyres (Class C1), which included within the scope of this gr.:
Comments	Definition for passenger tyre (Class C1) has not been mentioned anywhere. Also tyres falling under passenger category need more clarification before finalization of Sound emission limits due to sub-categories like van etc.
Comments	In subsequent clause no. 4.10.6.6.3, 4.10.6.8 and 4.10.6.10 test speed and test procedure calls for?????? tests on C2 and C3 category of tyres, which are not covered under this regulation. <i>if these belong to LT and C category of tyres.?????????</i>
Clause 4.11 Tyre Wet Grip Test	
Clause 4.11.3.2.1	The vehicle shall be a standard M1 category vehicle, capable of a minimum speed of 90 km/h and equipped with an anti-lock braking system (ABS).
Comments	Normally tyres with 145 and below sectional width are being used for slow speed vehicle and that too without ABS, so it will be difficult for such category of tyres to have full justification for this test.