Transmitted by the expert from India

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

Giving below our additional comments on Tyre Document gtr-09-02e Draft, dated 10 Jun 2010, Harmonised provisions concerning pneumatic tyres for passenger and light truck (commercial) vehicles.

Clause 3 Definitions	
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? Incidently, FMVSS has only one category which meets 'alpine marking'
Clause 4.2.1 Tyre identification number format	
Comments	TIN stamping template to be finalized as soon as possible so that provision for the same can be implemented in moulds, new and existing ones.
Justification	A definite timeframe would be needed in view of new additions meeting labeling requirements effective 2012
Clause 4.2.2.7 Maximum permissible inflation pressure	
Comments	Maximum permissible inflation pressure showing difference via-a-vis ETRTO
Justification	As per ETRTO, the maximum permissible inflation pressure for standard tyre is 250 kPpa and for reinforced or extra load tyre is 290 kPa as against 240 and 280 kPa specified in GTR.
Clause 4.2.2.10 Tube type 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. **********