

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

Giving below our comments on Tyre Document gtr-09-03e Draft, Proposal to amend Draft gtr with respect to Rolling Resistance and Rolling Sound in 10th June 2010 document

<b>Clause 4.7.1 Rolling Sound</b>	
<b>Proposed change</b>	Rolling sound limits to be kept as per 09-02e draft proposals
<b>Justification</b>	The limits proposed in the subject documents are the limits proposed for 2016 by ECE.
<b>Clause 4.9 Requirement for Rolling Resistance</b>	
<b>Comments</b>	With no explicit mention of 'module' concept for gtr, would the inclusion of RR mean all tyres have to comply with it (Becomes a Mandatory requirement instead of Optional)
<b>Clause 4.9.1 Requirement for Rolling Resistance</b>	
<b>Comments</b>	The RR limit values are of 2016 (Phase2) plan. As per earlier plan these limits will be implemented by Nov 2018
<b>Justification</b>	These values as per EC117 would get implemented only effective 2018. So any timeline ahead of this date would call for elaborate justification .
<b>Clause 4.9.4.4 Test Inflation Pressure</b>	
<b>Comments</b>	In Table 2 foot note "a" "For those passenger car tyres belonging to categories which are not shown in ISO 4000-1:2010, the inflation pressure shall be the inflation pressure recommended by the tyre manufacturer, corresponding to the maximum tyre load capacity, reduced by 30 kPa." Will lead to altering of test inflation pressure which will result in the actual measured values.
<b>Justification</b>	For the pressure like 250 & 290 kPa marked on tyre (in line with ETRTO), the test inflation pressure by using this method will be 220 kPa and 260 kPa, which is higher than the recommended pressure.
<b>Clause 4.9.8.5 Instrumentation Accuracy</b>	
<b>Comments</b>	Relaxed instrumentation accuracy than prevailing standards
<b>Justification</b>	Impact of the relaxed tolerance for instrumentation accuracy (GTR allows a relaxed instrumentation accuracy than ISO 25850) on the actual RR value and grading for labeling is not clear.

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