

**Comments from India for discussion on 16<sup>th</sup> / 17<sup>th</sup> Feb 2012**

***A. Endurance test, Low Inflation pressure & High speed performance test as per FMVSS 139***

*Remark:*

India had in past raised the issue of testing speed mismatch for LT/C category of tyres having speed rating “M” and below (Ref page 2 of Minutes of the 11<sup>th</sup> Ad-Hoc Working Group Meeting for a gtr on tyres September 16,2011(9:30 – 17:30),Geneva).

Also High Speed test for speed of 160kmph should not be made applicable for tyres with speed symbol “F-Q”. India proposed to discuss this issue during second phase of the gtr, supported by European Commission.

*Explanation:*

FMVSS 139 Hi-Speed test (1.70 m drum) is having following steps for testing the tyres

120' @ 80 km/h (Break-in & cool-down)

30' @ 140 km/h

30' @ 150 km/h

30' @ 160 km/h

Based on the existing running sizes used in India, there is a group of sizes which have speed ratings from “L” to “Q” (which is 120km/h to 160km/h). This group has max. load capacity of less than 1250 kg, hence does qualify under category of tyres being covered under gtr.

Examples of such tyres are :

a) 7.00 R 16 12 PR LT, load capacity 1215 kg, speed rating M

b) 7.00 R 15 10 PR LT, load capacity 1050 kg , speed rating M or Q

c) 185/85 R16 8 PR LT, load capacity 925 kg, speed rating Q

d) 185 R 14 8 PR LT, load capacity 850 kg, speed rating Q

This group, by virtue of its speed rating range, cannot be tested as per FMVSS 139.

The tests applicable to such types of LT tyres needs to be clearly defined and addressed . For example such tyres may not need a high speed test but can have step load test like ECE54.

***B. “C” type tyre marking.***

*Remark:*

Ref Clause 3.3.13.1 for C type tyre, Making the C or LT marking optional for tyres going on 5 deg drop center rim. We propose to make the marking mandatory.

*Explanation:*

It may cause confusion with passenger tyres of the same size.

The marking is optional only in cases where there are LIs both for single and dual and LI 121 and below.

The reason is that there are some tyres in the free rolling family (without either C or LT and relatively high pressures) with dual load index and LI 121 and below. The point is raised looking at the tyre sizes like 145/80R12, 155R13, 165R14 which are being used in passenger as well as Free Rolling Tyres in small trailer. With allowing higher load index tyres without "C" or "LT" marking, people in countries like India / Asian countries (Where there is low awareness about load index) there is high possibility of using passenger version tyre in FRT application.

***C. Snow tyre and Snow tyre under extreme conditions :***

*Remark:*

Clear definition for Snow tyre and Snow tyre under extreme conditions also the qualification criteria for M+S mark tyre. This is not resolved.

*Explanation:*

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? Incidentally, FMVSS has only one category which meets 'alpine marking'

***D. Harmonization of LT&C tyres.***

Separate draft for Harmonized provisions for LT& C tyres is being made – to be shared if possible.

***E. Tyre Identification Number.***

*Remark:*

Clarity on Marking of 2 digit /3 digit numbers for universal plant codes-Will this be applicable only for new sizes if so what to do for the running sizes.

Clarity on clause 3.2.1.6 The content of the manufacturer's code is optional ,but the data field is not.

*Explanation:*

Current tyre molds are with 2 digit plant codes, if these had to be changed to the new Tyre Identification Number, both sidewalls may have to be changed/redesigned to accommodate these numbers. Also for the manufacturer's code industry currently follows 4 to 6 digits.