

Japan comment for R117-02 C3 threshold

Japan is willing to adopt R117-02 in near future therefore Japan investigate the situation in Japan. in Japanese market, Japanese tyre manufacturers have many C3 tyres that Wet Grip level is within 0.65 to 0.80. Quantity of those tyres are more than 1,1 million tyres. This quantity is equal to approximately 110 thousands vehicles and it is approximately 19% of vehicle yearly sales. (Total yearly sales volume is 594 thousands vehicles) And Japanese Government and tyre manufacturers do not have any accident data and any market claim due to low wet grip level in Japanese market. It means that 0.65 threshold for C3 tyres is enough safety level in Japanese market.

Sales volume of C3 tyres - Wet Grip level is from 0.65 to 0.80 (from Jan/2012 to Dec/2012)

Category	Sales volume
Normal tyre	162,000
Traction tyres, Severe snow tyres, Special tyres	931,000
TOTAL TYRE SALES VOLUME	1,093,000

(from Jan/2012 to Dec/2012)

Sales volume of Truck/Bus vehicles

Truck and Bus	Sales volume
TOTAL VEHICLE SALES VOLUME	593,754

Japan support the working document (WP29/2013/66) which is proposed by EC/France/ETRTO because Japan believes this threshold is safe enough.

But, of course, Japan will hear the opinion of other Contracting Party in the meeting.