



Transmitted by the expert from ETRTO

Informal document **GRB-62-17**  
(62nd GRB, 1-3 September 2015,  
agenda item 7)

# **ETRTO comments on NL GRB-61-03**

**NL proposal for amending tyre noise limits  
in UN Reg. 117.03**

## References:

GRB-60-08, GRB-60-012, GRB-60-14-rev1 presented by The Netherlands and  
GRB-61-18 presented by ETRTO



# Key Comments

- ❖ The subset of C1 & C2 tyres used in the studies presented by The Netherlands **does not represent the European tyre market** and is biased towards low noise
- ❖ The database used in the studies presented by The Netherlands **do not identify which tyres are traction marked.**
- ❖ The **definition of C3 traction tyres** used in the studies presented by The Netherlands **is not according to UN Reg. 117.02**
- ❖ ETRTO cannot enter into details on the tyre market pricing
- ❖ Any assessment in terms of future potential for improvement can only be done as long as all tyres complying to all UN Reg. 117.02 requirements are on the market.

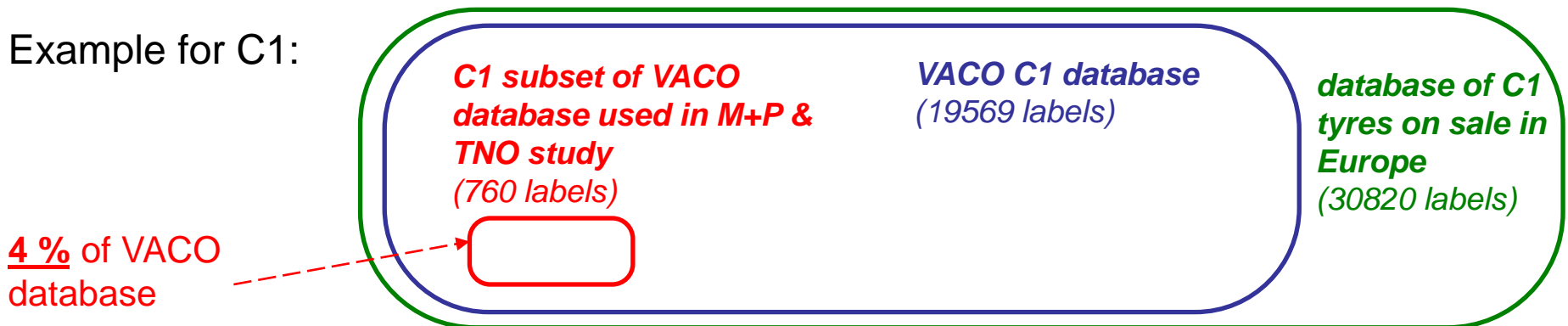


# Evaluation of tyre noise limits based on sold tyres in The Netherlands – C1 & C2 tyres

ETRTO considered the database from which NL extracted a subset for their studies and, in our view,:

- ❖ The VACO database is representative for the tyres on sale in Europe
- ❖ The subset of C1 & C2 tyres derived from the extraction of the 2013's VACO database is biased towards low noise and is not representative for the current VACO database.

Example for C1:





# Evaluation of tyre noise limits based on sold tyres in The Netherlands – C3 tyres

ETRTO considered the database from which NL extracted a subset in their studies and, in our view,:

- ❖ The subset of C3 tyres in the M+P and TNO study seems to have a similar distribution compared to the distribution of the C3 VACO database

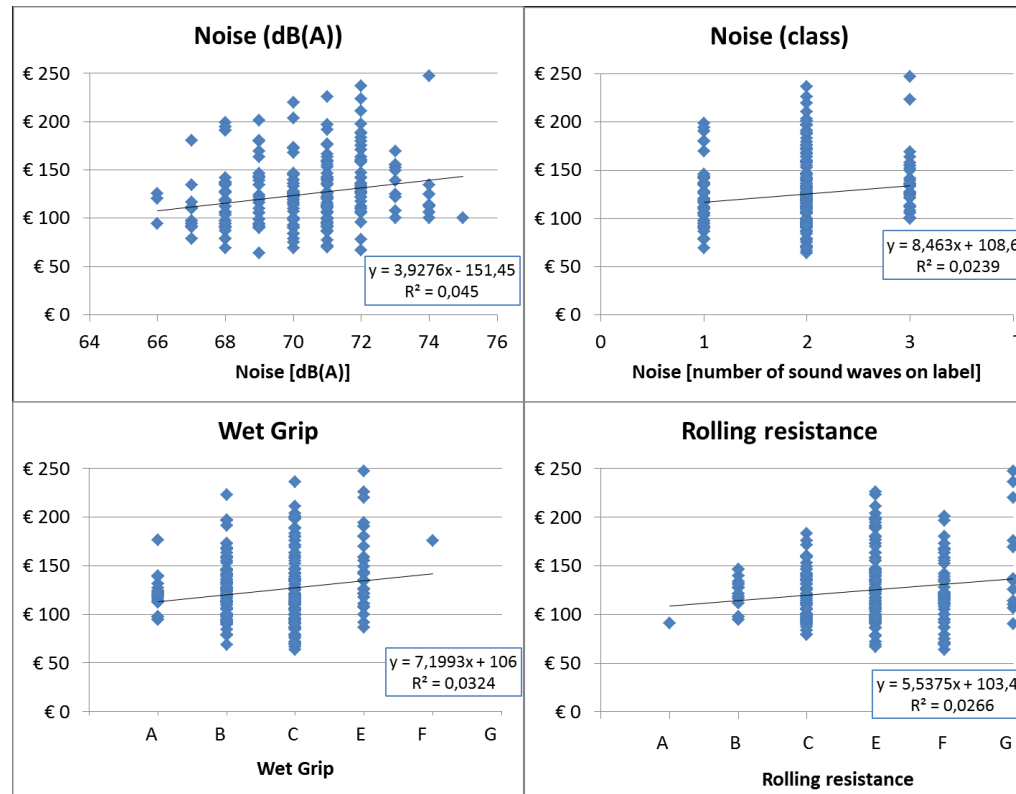
- ❖ **Traction tyres**

In the VACO database the “Traction” marked tyres according to UN Reg. 117.02 cannot be identified.

**However, the assumption in the M+P & TNO study that C3 traction tyres are all tyres fitted on the drive axle is incorrect.** Consequently, the 2 dB(A) allowance is assumed for a too high number of C3 tyres.

# Cost-Benefit Analyses of the use of better tyres

Ref. GRB-61-03: Figure 3. Aspects of the tyre label versus the advice sale prices of car tyres in the Netherlands. Internet sales the Netherlands, 472 tyres size 205/55R16, <http://www.autobandenmarkt.nl/index.html>.

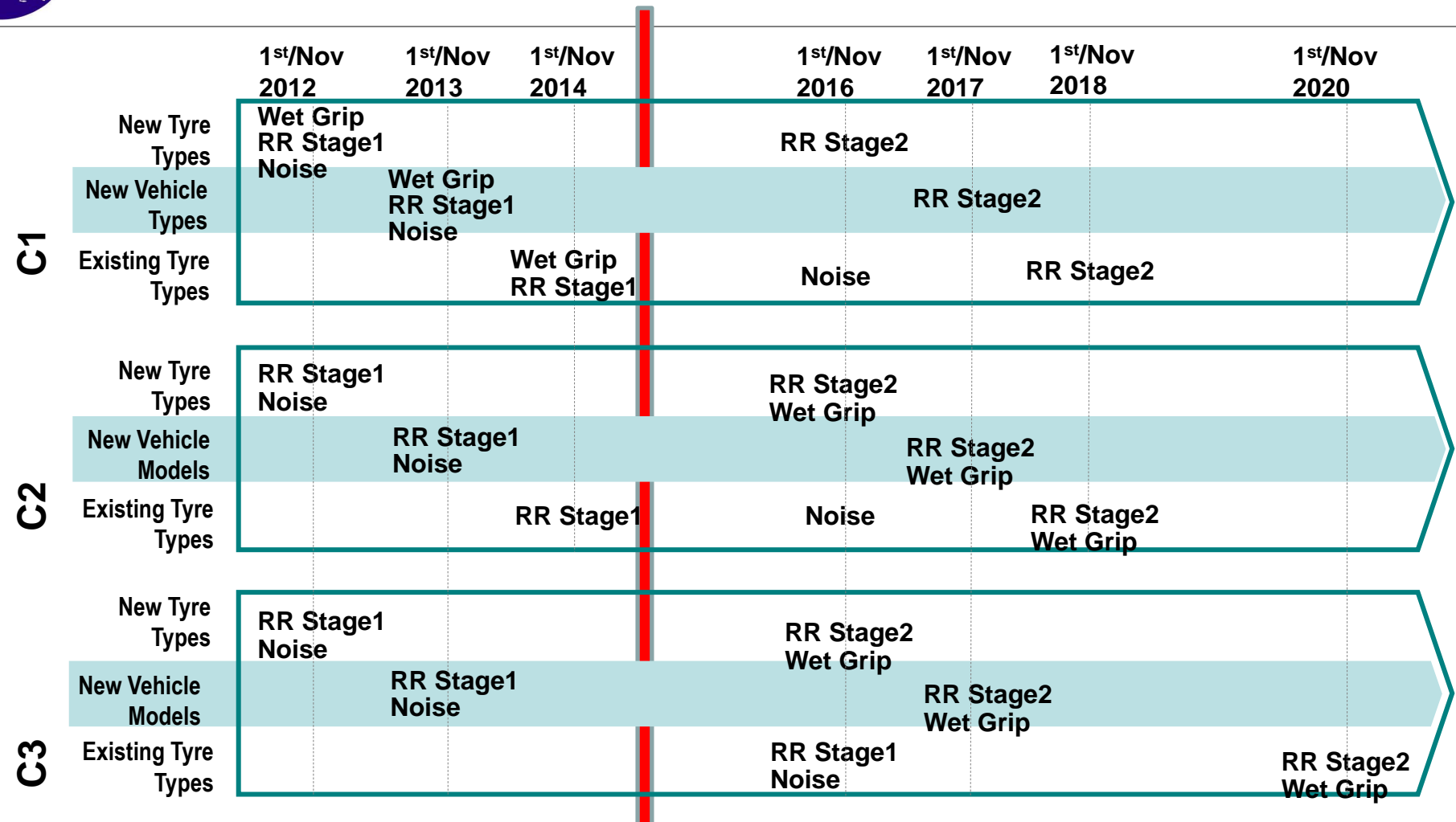


ETRTO comment:

- The link between the 4 graphs is not considered and thus the conclusions are not valid



# UN Regulation 117 IMPLEMENTATION STEPS



**A realistic State of Art and its assessment in terms of future potential for improvement can only be done when all the tyres complying to all UN Reg. 117.02 requirements are on the market.**



European Tyre and Rim Technical Organisation

**Thank you!**