



ETRTO

The European Tyre and Rim
Technical Organisation

Informal document GRBP-78-22
Agenda item 7(b)

ETRTO responses on comments to the amendment proposal ECE/TRANS/WP.29/GRBP/2023/9

GRBP 78th session

Background

- ETRTO presented during GRBP 77th session an amendment proposal to R106 (ECE/TRANS/WP.29/GRBP/2023/9), with among the proposals to extend the scope to 'E' speed symbol.
- Germany and Netherlands raised some comments on this speed extension proposal to 'E' speed index.
- GRBP kept the document on hold for further consideration during 78th session and suggested ETRTO to organize a Joint meeting with Germany and Netherlands to clarify ETRTO proposal and to respond to the concerns.
- Meeting with Netherlands and Germany took place on 30 May 2023



Question from Germany

- Possible misuse of Agricultural and Commercial Vehicle tyres due to the increase from Speed Symbol “D” to “E” for Agricultural tyres that could be fitted with Commercial Vehicle tyres (that will be allowed to have an additional service description with Speed symbol “E”).
1. Minimum main service description for Commercial Vehicle tyres is “F” and the possibility to mismatch of these both tyres will not be possible as Agricultural tyres will have “E” (if agreed by GRBP) as maximum main service description.
 2. The additional service description with “E” speed symbol introduced through the last amendment of UN R54 adopted by GRBP will be used for very specific applications (e.g.: 275/70R22.5 urban bus tyres) but these Commercial Vehicle tyres will have anyhow to comply with the requirements of having at least “F” speed symbol in the main service description.
 3. Based on ETRTO standards, there is no possibility to find a Commercial Vehicle and Agricultural tyres matching the same diameter, load capacity, speed capacity and rim profile.

Misuse of CV and AGR tyres

- Tyre size designation and service description between Commercial Vehicle and Agricultural tyres are very different, see following example:
 - CV tyre: 315/80R22.5 LI154/150 SS = F and above OD = 1076mm Measuring rim width = 9.00
 - AGR tyre: 560/45R22.5 IMP LI146 SS = E or below OD = 1076mm Measuring rim width = 18.00
- Current table in Annex 7 of UN R106 is already allowing tractor vehicles to go to faster speeds (70 km/h) by reducing the load and we have no examples of mismatch.

Question from Netherlands

- Agricultural tractors may be driven without driving license in Netherlands, for this reason, Netherlands is hesitating about the possibility to increase the maximum speed for this tyres/vehicles.
- Today it is already possible to drive at 70 km/h. As current table in Annex 7 of UN R106 is allowing tractor vehicles to go to faster speeds (70 km/h) by reducing the load and we have no examples of mismatch.



ETRTO

The European Tyre and Rim
Technical Organisation

Thank you