



**European Tyre and Rim Technical Organisation**

**To :** Mr. R. Hubert  
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**CC. :** Mr. J. Jerie (GRB)  
TAL Sub-Committee

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**Comments to the latest version of the Draft Regulation on  
“Uniform Provisions concerning the Approval of Tyres with regard to  
Rolling Sound Emissions” as per  
TRANS/WP29/2002/7 issued on 18-12-2001**

**General**

ETRTO is in agreement with amendments discussed and approved in official GRB meetings, but in most cases cannot accept additional amendments.

**Detailed analysis**

Items 1.1 and 1.1.4 : the word “primarily” as shown in Annex 2 of the GRB report of the 33<sup>rd</sup> meeting shall remain.

Reasons: to be consistent with the scopes of regulations 30, 54, 75 and 106

Item 2.1 (iv): no need to add definitions for the categories of use: to the limit the item can read “(iv) the category of use (normal, special, snow)”

Reasons: Definitions are already shown in regulations 30 and 54 and shall not be repeated, as already included by item 2

Item 2.6 : delete

Reasons: the definition is already shown in regulation 30 and shall not be repeated, as already included by item 2

Item 2.7 : delete

Reasons: the exclusion of tyres for competitions is derived from regulation 30, where the wording has been in force for more than 20 years without any need of a specific definition.



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Item 2.8 : delete

Reasons: the definition is wrong as in contrast with item 1.2 of Annex 3, where it is specified that the speed is that measured at line PP'

Item 6.1.1.2: to read "... 'special' (see paragraph 4.2.6) the limits ..."

Reasons: for conformity with the amendment proposed for paragraph 6.1.1.1

Item 12

In general the great majority of the subparagraphs has nothing to do with tyre type approvals.

Items 12.1: delete

Reasons: paragraphs 12.1 (a) and 12.1 (d) repeat concepts of the 1958 Agreement; whilst paragraphs 12.1 (b) and 12.1 (c) only refer to vehicles and have nothing to do with a type approval authority asked by a tyre manufacturer for a tyre type approval.

Item 12.2: delete

Reasons: the paragraph is rather confusing because it mentions 'national approval' when the scope of ECE regulations is to grant international type approvals accepted by all Contracting Parties. Due to the specific definition of the 'tyre type' adopted for this regulation (which for sound technical reasons substantially differs from that of other ECE regulations dealing with tyres) in practice the paragraph only means that type approval authorities can only grant a type approval to this regulation if the tyre type is in conformity with the requirements, which is already stated in paragraphs 5.

In addition the paragraph states that type approval to the regulation are not required before August 2003, which very likely will be a date preceding any official publication, recognition or application of the same regulation.

Items 12.3 and 12.4: delete

Reasons: they have nothing to do with tyre type approvals and should be better placed in regulation N.51 dealing with vehicle type approval

Item 12.6 : delete the first part "Until 31 December 2005 at the latest" and modify to read "The parties to the Agreement which apply this Regulation may designate laboratories and test facilities of tyre manufacturers as approved test laboratories. In that case they may, if they so desire, be represented at the tests by one or more persons of their choice"

Reasons: to adopt the same text of paragraphs 12.2 and 12.3 of regulation 30 and 11.2 and 11.3 of regulation 54 as they are standard practice since many years and very likely type approval authorities certifying to the new regulation will be the same already certifying tyre to regulations 30 and 54.

Annex 1- item 6: delete

Reasons: the scope of the regulation is to assess that tyre types have tyre/road sound emissions which do not exceed the limits set by the regulation (see paragraphs 6.1 of the regulation).

The 'tyre type' (see paragraphs 2.1 of the regulation) may include a range of various 'tyre size designations' and various 'trade descriptions', as to be specified in the application list, having each a specific value of sound emission.



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Moreover It has been largely proved that the variability of the test track as per Annex 4 is larger than 2 dB(A).

Therefore to publish into a type approval communication valid for the entire range of tyres a value, which has been measured on a given sample and on a given test track, without supplying all detailed information as shown in the test report will be misleading for any person concerned.

Any case the type approval authority is in possession of the test report and all necessary details of the conformity test are shown in the test report whose references are mentioned in items 5, 7 and 8 of the same communication form.

Annex 2 – example 2: replace with the sketch shown in document TRANS/WP.29/GRB/200/4 – page 11, which was approved and confirmed by many GRB revisions.

Reasons: the new sketch will require all moulds of existing tyres (hundreds of thousands of existing moulds) to be completely modified after a type approval to the new regulation. This will be unnecessarily expensive and in some cases modify the aesthetics of the tyre sidewall. The previous lay out on the contrary is in conformity with the Note of annex 2 and will leave liberty to the tyre manufacturer to place the new type approval number in a suitable location compatible with the layout of all other elements on the tyre sidewall.

Annex 3 paragraph 0 – 8<sup>th</sup> line to read “..tyre rolling sound..” as per GRB/2000/4/Add.1

Annex 3 paragraph 2.5.4 : the first line to read “The tyres shall be ...”

Reasons: to be coherent with the following text in the same paragraph.

Annex 3 paragraph 4.2 to read :”  $\bar{v}$  is the mean value of logarithms of speeds  $v_i$ ”

Reasons: to use the same symbols as in the following mathematical expression.

Best regards,

Léon Chession  
Secretary General