



European Tyre and Rim Technical Organisation

Brussels, 18 December 2002
TAL404-02-ETR-GRRF-RUN-FLAT-R64

Subject: Draft amendment to Regulation N° 64.

Reference: TRANS/WP. 29/GRRF/2002/17 (UK proposal).

On behalf of the European Tyre Manufacturers ETRTO would like to make the following comments on the UK proposal for a draft amendment to Regulation N° 64 (Temporary use spare wheels/tyres) as referenced here above.

A) Scope

As run flat systems can also be foreseen for N1 class vehicles, when equipped with passenger car tyres, their use can not be limited to M1 class vehicles only.
In addition we see no reasons to restrict the mass of M1 vehicles to 2500 kg.

Therefore paragraph 1 (scope) shall be amended accordingly.

B) 'Uni-directional' tyres

In the case of Passenger Car tyres the practice to mark on the sidewalls an arrow to identify a 'preferred sense of rotation' does not qualify them as "uni-directional" tyres.
In fact this symbol just represents recommendations in order to optimize some performances (for example treadwear).

In addition paragraph 3 (markings) of ECE regulation 30 does not identify or recognize any 'uni-directional' tyre, there is only mention in item 3.1 of 'asymmetrical' tyres, but only for the purpose of location of the markings.

ETRTO therefore recommends not to include any mention or specification (paragraphs 1, 2.4.4, 2.8, 5.1.4.1, 5.1.4.2, 6.1.2 and 9.3) for 'uni-directional' tyres in Regulation 64 until their need is requested by the market, those tyres have been developed and have been properly recognized by ECE regulation 30 by an appropriate identification marking.

C) Run Flat Systems

ISO/TC31/SC3 is finalizing a norm on 'spare-unit substitutive equipments (SUSE)' which include various types of run-flat systems to avoid vehicles to be equipped with a 'spare unit'.

Amongst the various systems foreseen only some guarantee an 'extended mobility' and give the driver a sufficient degree of safety at a given speed and for a given distance.

These may be constituted by either:

- a 'normal' tyre plus a 'normal' wheel and an insert to support the under-inflated tyre
- a 'special' tyre plus a 'adapted' wheel and an insert to support the under-inflated tyre
- a 'run-flat' tyre with stiff sidewalls plus an adapted wheel

but in any case all of them require an efficient pressure monitoring system and a run-flat alarm to be installed on the vehicle.

To this purpose ETRTO suggest modifying definitions 2.4.1 and 2.4.3 as follows:

2.4.1. : "Normal Tyre" – Pneumatic tyre designed for use in an inflated state.



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2.4.3. : "Run Flat System" – Assembly of functionally dependant components, including a tyre which together provide the specified performance granting "Extended mobility" to a vehicle thus equipped.

Add at the end of item 2.4.2, as per amendment 3 to regulation 30, :
"These tyres shall be permanently marked 'TEMPORARY USE ONLY'"

Replace item 2.4.4. to read:

2.4.4. : "Run Flat Tyre" – Tyre designed to operate in an inflated mode and capable of running at least a specified distance under prescribed conditions in the event that the tyre does not hold air".

In the specific case of 'run-flat tyres', those have also to be recognized by ECE regulation 30. Therefore as soon as the relevant ISO standard will be finalized ETRTO will accordingly propose an amendment.

Also to this purpose ISO/TC22/WG12 is preparing a specific norm on tyre pressure monitoring systems (TPMS) and on run-flat warning systems (RFWS). ETRTO therefore suggests to insert into regulation 64 also all pertaining definitions.

Moreover it shall be clearly specified by a new statement in paragraph 5.1 that vehicles can be equipped with a 'run-flat system' only if they are also equipped with an effective tyre pressure monitoring system and a run-flat monitoring system.

D) Miscellaneous

item 2.8

On the market there are vehicles equipped with different tyre and wheel sizes on the front and on the rear axle.

Therefore ETRTO recommends to clearly specify, in the first indent, that the case applies only when the size designation of one tyre or of one wheel differ from those of the same components fitted on the opposite position of the same axle.

items 5.1.4.1. and 6.1.2.

The development and performances of efficient 'run-flat systems' is quite recent therefore it is premature to establish limits for the service.

Therefore ETRTO agrees that the '80km/h Max' speed warning symbol be only applied in case of 'temporary use spare tyres' and that the value to be specified for run-flat systems be left to the vehicle manufacturer.

Therefore the last sentence shall be modified, in order not to be misinterpreted, as follows:
" The requirements of this paragraph shall not apply to vehicles equipped with 'run-flat systems'.

Moreover item 6.1.2 shall be reworded accordingly in order to supply the appropriate information to the driver inclusive of a minimum distance he can drive after the lighting-up of the 'run-flat' warning or alarm.

Item 6.1.3

'Run-flat' systems equip vehicles in order to face with emergency or unexpected situations.

In our opinion it will therefore be inappropriate to impose an unlucky driver not to have two or more tyres punctured at the same time.

Yours sincerely,

Léon Chession.