

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 109

1 Introduction

The text reproduced below is a supplement to proposal ECE/TRANS/WP.29/GRRF/2008/6 prepared by the experts from the Netherlands in order to insert the definition of ASP in paragraph 2. of Regulation No. 109.

The modifications to the existing text of the regulation are marked in **bold** characters

2 Proposal

Paragraphs 2.42. and 2.37., amend to read:

2.42. "Sidewall veneer" is a material used to cover the sidewalls of the casing thereby allowing the required markings to be formed. **This material can also be used to protect the outside of the tyre against abrasion in service. In this case the protective rubber layer is called ASP (additional sidewall protection).**

2.37. "Retreading" means the generic term for reconditioning a used tyre by replacing the worn tread with new material. It may also include renovation of the outermost sidewall surface (**e.g ASP**) and replacement of the crown plies or the protective breaker. It covers the following process methods:

2.37.1. "Top capping" - replacement of the tread;

2.37.2. "Re-capping" - replacement of the tread and with the new material extending over part of the sidewall; (*)

2.37.3. "Bead to bead" - replacement of the tread and renovation of the sidewall including all or part of the lower area of the tyre. (*)

(*) Including too the process method used in applying of the ASP."

3 Justification

The introduction of the definition of ASP at the beginning of the Regulation No. 109 is useful for the reader. Thus, he can expect to meet some provisions later in the text as defined in the paragraph 7.1.4.3. proposed by the expert of the Netherlands in document ECE/TRANS/WP.29/GRRF/2008/6.

Moreover, ASP process method having to be recognized as being a complementary retreading method, it was necessary to introduce it among the involved definitions of Regulation No. 109. Nevertheless, considering that this method does not appeal to a new technology, no new definition was necessary but only a complement to that existing.

In this way, no further administrative requirement has to be applied and the existing practice can be legalized easily. Thus, the transport and retread industry are not penalized because no extension of approval is needed.