

Regulation No. 117 (Tyres rolling noise and wet grip adhesion)

OICA comments to ECE/TRANS/WP.29/GRB/2010/3

**Editorial comments:**

Page 15, paragraph 6.4.1.1.

The table refers to a "brake on snow procedure" and "spin traction test".

These terms are not defined. In consequence, they should be replaced by the terms defined in Annex 7: "Braking test" and "Traction test".

Footnotes 11/ and 12/: There is no section C or B in Annex 7.

Replace "section C" by "paragraph 3" and "section B" by "paragraph 2".

Page 16, paragraph 6.5.1.

The reference for "and/or" is not clear. It is proposed to amend the paragraph as follows:

"6.5.1. The tyre shall have a tread pattern with minimum two circumferential ribs, each containing a minimum of 30 block-like elements, separated by grooves and/or **by** sipe elements, the depth of **both of** which has to be minimum ½ of the tread depth, or..."

Page 18, paragraph 12.1.

Delete the stroked trough text because it is redundant:

"12.1. As from the date of entry into force of the 02 series of amendments to this Regulation, Contracting Parties applying this Regulation shall not refuse to grant ECE approval under this Regulation for a type of tyre if the tyre complies with the requirements of the 02 series of amendments, ~~including the stage 1 or stage 2 rolling sound requirements set out in paragraphs 6.1.1. to 6.1.3., the requirements for wet grip performance set out in paragraph 6.2., and the rolling resistance requirements set out in paragraph 6.3.1. or 6.3.2.~~"

Page 64, annex 6, paragraph 5.1.1.

Replace "4.5.1" by "4.6.1 of this annex".

Replace "4.5.2" by "4.6.2 of this annex".

Page 65, annex 6, paragraph 5.1.2.

Replace "4.5.1" by "4.6.1 of this annex".

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Page 65, annex 6, paragraph 5.1.3.

Replace "4.5.1" by "4.6.1 of this annex".

Page 75, annex 7

Paragraph 2: Replace "Spin traction method" by "traction test".

Paragraph 3: Replace "Braking on snow method" by "braking test"

Justification: The text should use the terms which are defined.

Page 77, annex 7

Numbering of paragraphs is wrong: add "3." in front of each paragraph number.

Page 77, annex 7

Delete footnotes (1) and (2) in figure A7.1.

Page 83, annex 8

Paragraph 1.1: replace "3." by "1.3".

#### **Technical comments:**

"1.2. Contracting Parties shall issue or accept approvals to rolling sound and/or wet adhesion and/or rolling resistance. Each Contracting Parties shall notify to the Secretary-General of the United Nations their option for the ~~mandatory~~ performance(s) required **in their territory**. Such notification shall have effect in accordance with the time scales laid down in Article 1, paragraphs 6. and 7. of the 1958 Agreement (E/ECE/TRANS/505/Rev.2)."

Annex 9

Replace "[1-5]" by "at least 5" (four times).

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