Informal document analysing and commenting the items included in working document ECE/TRANS/WP.29/GRVA/2018/5

Submitted by the experts from the European Tyre and Rim Technical Organisation**

^{**} In accordance with ECE/TRANS/274, para 52, with ECE/TRANS/WP.29/1139, para. 33 and with the programme of work of the Inland Transport Committee for 2014–2018 (ECE/TRANS/240, para. 105 and ECE/TRANS/2014/26, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

The working document ECE/TRANS/WP.29/GRVA/2018/5 includes proposals to improve the text in UN R117 with regard to the following items:

- a) Standard Reference Testing Tyres definitions and references;
- b) Use of C3 SRTTs in the scope of the Snow Grip Test;
- c) Testing conditions for the Rolling Resistance Test procedure.

After further checks and internal discussions, the Industry has come to the following conclusions for each of the abovementioned points:

a) SRTT

The ASTM standard versions currently referenced in R117 are obsolete, making the test virtually unfeasible; in fact the manufacturer ends the production of the tyres according to the previous version after an interim period and this makes the procurement of such tyres impossible after some weeks from the new version release.

At the same time it is important to keep the reference of the year in order to be alerted whenever a new version is agreed and released, to ensure that no change in performances will occur.

It is needed to perform a thorough check to ensure that all the references are updated all over the text: for this reason it would be advisable to define the SRTT version only once in paragraph 2 and afterwards to refer to a "code" for the rest of the text.

b) SRTTs to be used for the Snow Grip Test

Currently there are two C3 SRTTs defined: a narrower (with smaller diameter) and a wider tyre (with larger diameter). Given the fact that these two tyres are equivalent for the purpose of this test, it would be better to avoid any discrimination between the two Class C3 tyres. Furthermore, this approach would solve some problems of fitment with specific vehicles which may at present sometimes be solved by the use of control tyres, sometimes makes testing virtually impossible.

This change will also impact the Annex where the test procedure is described.

c) Testing conditions for the Rolling Resistance Test procedure.

The testing conditions as currently detailed in Annex 6 may lead to some confusion or misunderstanding.

To avoid this and to be more consistent with the activities performed at global level to improve the quality of the procedure, a rewording and refinement of the references would be advisable.

The above considerations would require an amendment to the mentioned working document, but the Tyre Industry would like to avoid too many iterations in this process, because some other internal and external discussions are needed to get to a better proposal.

For this reason ETRTO kindly invites the Contracting Parties to provide their comments, if any, on the best way to improve the described points, in order to finalize a working document for the 69th Session of GRB.