

Response to document ECE/TRANS/WP.29/2009/76
(Transposition of Euro 5/6 requirements into ECE R101.01)

OICA would like to thank the European Commission and its consultants (KTI - Hungary and VTT - Finland) for their considerable work in compiling this document and those related to it (ECE/TRANS/WP.29/2009/57 and ECE/TRANS/WP.29/2009/75).

This is essential work for the application of the most recent stages of European emissions legislation in Contracting Parties outside of the European Union.

However, having analysed the document, OICA has the following major concerns, which could however not be reviewed at the last GRPE session (58th session, June 09):

- As in Paper ECE/TRANS/WP.29/2009/57, the requirement to select tyres based on their rolling resistance, which applies in the EU from 2014, has been proposed to apply with immediate effect. Not only does this deviate from the Euro 5/6 requirements but is unworkable due to the absence of the required ISO standard for measurement of tyre rolling resistance (currently in progress).

A detailed assessment of OICA's concerns is attached as Appendix 1.

In conclusion, taking into account these comments, OICA suggests that the European Commission should, before this proposal can be finally adopted by WP.29, review these with all interested parties, including industry, in order to come up with a final, correct document that can be adopted.

Appendix 1 – Detailed comments:

Item	Page	Reference	Comment
1	2	<p>Annex 6</p> <p>Paragraph 1.3.5. amend to read :</p> <p>The tyres shall be of a type specified as original equipment by the vehicle manufacturer inflated to the pressure recommended for the test load and speeds. The pressures shall be indicated in the test report.</p> <p>The choice of tyres shall be based on the rolling resistance. The tyres with the highest rolling resistance shall be chosen, measured according to ISO 28580.</p> <p>If there are more than three tyre rolling resistances, the tyre with the second highest rolling resistance shall be chosen.</p> <p>The rolling resistance characteristics of the tyres fitted to production vehicles shall reflect those of the tyres used for type-approval.</p>	<p>in Reg 692/2008, this requirement enter into force from 2014.</p> <p>It should not be included in this amendment as the ISO standard for measurement of tyre rolling resistance does not yet exist.</p>