



European Tyre and Rim Technical Organisation

**Subject : Regulation N° 30 – Passenger Car Tyres –
UK proposal concerning the marking of Service description on high
speed tyres**
Reference : TRANS/WP.29/GRRF/2001/11 (GRRF 49 Informal document 12)

On behalf of the European Tyre and Rim Manufacturers, ETRTO would like to comment respectfully to informal Document 12 of GRRF 49, as follows **(the document has been distributed for the 50th session as document TRANS/WP.29/GRRF/2001/11)**

“The UK proposal consists of the creation of standard speed categories for maximum speeds above 300 km/h and in revising the Service Description for all tyres with maximum speeds over 210 km/h. ETRTO reminds that the current Service Description for tyres having Speed Symbol higher than H (210 km/h) was agreed by GRRF more than 15 years ago and since then is accepted by the users with no complains. ETRTO would also like to express that the users will receive no additional information by the use of more detailed information as they have only to match Tyre Size and Service Description to that chosen by the vehicle manufacturers and specified in the vehicle type approval. More detailed information will be redundant and misleading as the users have no access to such data as vehicle design speed COP tolerance and maximum axle load capacity of the vehicle and moreover to the correspondence of actual load with load index and actual speed with speed symbol. Also in case of speeds over 300 km/h, the users shall rely on expertise from tyre dealers who may refer to details contained in the updated technical literature supplied by the tyre manufacturer in relation to these extremely high performance tyres.”

Therefore, we consider that UK proposal should be withdrawn completely.