Informal document No. **8**
(51st GRRF, 4-8 February 2002,
agenda item 6.3.)

European Tyre and Rim Technical Organisation

To. : Mr. J.A. Ramos Garcia
Secretary GRRF
Economic Commission for Europe
Transport Division
Palais des Nations
CH - 1211 Genève 10

CC. : TAL Sub-Committee

Brussels, 16 January 2002
TAL 010-02-ETR-GRRF-REG 30

Dear Mr. Ramos Garcia,

Subject : Regulation N° 30 – Passenger Car Tyres –
UK proposal concerning the marking of Service description on high speed tyres
Reference : GRRF 49 Informal document 12
TRANS/WP.29/GRRF/2001/11
GRRF 50 Informal document N.1 (ETRTO Ref. TAL 132-01)

Further to our comments (GRRF 50 informal document N.1), sent in relation to the previous version of the same document referred to as GRRF 49 Informal document N.12, we would like to expand the reasons for our opposition to the proposals to amend any paragraphs except for the newly proposed 2.32 and 3.1.3.4

A) Tyres with speeds up to 300 km/h

Directive 92/23/EEC, and directive 70/156/EEC specify that tyres suitable for the equipment of a vehicle are identified exclusively by means of :

- the tyre size designation
- the load index minimum compatible with the vehicle maximum axle load
- the speed index minimum compatible with the vehicle design maximum speed.

In some countries those parameters are also published, amongst other data, in the official document supplied together with the vehicle.

Therefore with the present arrangement of the ‘service description’, coherent for the last 20 years, only the vehicle manufacturer and the vehicle type approval authorities have to verify, once for all, that the minimum load/speed compatibility of the ‘service description’ specified for the vehicle. For the selection of the replacement tyres the user shall just verify that both the load index and the speed symbol marked on them are at least equal to the values specified for the vehicle. He needs no other information.
As already mentioned, the general public got accustomed with that practice since 20 years and also the police can rapidly check the conformity of the equipment for any vehicle.

32 Av. Brugmann – Bte 2 – B-1060 Brussels, Belgium – Tel. ++32-(0)2-344 40 59 – Fax. +32-(0)2-344 12 34
E-mail : info@etrto.org – Internet : http://www.etrto.org

European Tyre and Rim Technical Organisation

In case the new arrangement of the 'service description' would be adopted, it would necessitate for the user to know exactly the maximum load capacity of each axle of the vehicle, the correspondence between tyre load capacity and load index, the vehicle maximum design speed inclusive of tolerances and the correspondence between speed capability and speed symbol. Knowing all those information, which at present are not available to the general public, he shall, whenever he buys a new set of tyres, interpolate, with a calculator, the four values (two loads and two speeds) to verify whether the tyre is suitable for the vehicle. This practice will therefore require a very skilled and informed user and in general will cause millions of misfitments, especially because policemen, and periodic technical inspection stations, will never be in a condition to verify it.

For example a car having a maximum load per axle of 1300 kg and a maximum design speed of 234 ±5 km/h can be equipped, at the discretion of the vehicle manufacturer and according to the specific prescriptions of items in Regulation 30, with tyres having minimum service description either 97V or 93W.
The customer (or the policemen or the technical inspection station) shall just verify that if the tyre has a load index of 97 the speed symbol shall be at least V (which means that 97W or 98V are also suitable) or if the tyre has a load index of 93 the speed symbol shall be at least W (which means that 94W or 93Y are also suitable).

With the proposed arrangement of the 'service description' the customer, or the policemen, will be in a situation where he will be confronted with the following options, correspondent to the same 'service description' as for existing tyres,:
97H/94V or 93V/88W or any intermediate value of loads and speeds

Question: how can he verify that the tyre is the 'right' tyre for the vehicle ?

He, fist of all, must know that:

LI 97 equates 730 kg,
speed symbol H equates 210 km/h,
LI 94 equates 670 kg,
speed symbol V equates 240 km/h,
LI 93 equates 650 kg,
speed symbol W equates 270 km/h,
LI 88 equates 560 kg,

In addition he must know that the car maximum load per tyre is 650 kg and the car maximum design speed is 239 km/h.
At this point he shall to draw the following sketch and verify whether the two tyres are suitable for the vehicle !!!!
(see Annex 1)

This same exercise shall be performed each time the customer, the policemen or the inspector of the technical service, will find on the market a suitable tyre with other service descriptions.

32 Av. Brugmann – Bte 2 – B-1060 Brussels, Belgium – Tel. ++32-(0)2-344 40 59 – Fax. +32-(0)2-344 12 34
E-mail : info@etrto.org – Internet : http://www.etrto.org

European Tyre and Rim Technical Organisation

B) Tyres for speeds over 300 km/h

Also for these types of tyres we cannot agree with the proposal.
First of all, the presence on the market of cars requesting those tyres is negligible, as those are very sophisticated and extremely expensive cars.
Also the possibility of use on the roads at speeds over 300 km/h is minimal.
When used on circuits those cars will be equipped with specialized racing tyres, which are not subjected to any official type approval.
The tyres suitable to equip those cars are as well very sophisticated and extremely expensive and cannot be easily found on the market if not by specialized tyre dealers.
If those same tyres would be used to equip cars having maximum speeds up to 300 km/h, their service description as specified by regulation 30 would be more than adequate for a correct selection.
It is true that the actual top performances (applicable load and maximum speed) of those tyres can not be perceived from the tyre sidewalls, in fact those are just registered in the type approval documents and in the technical literature provided by the tyre manufacturer as requested by paragraph 4.1.15.
Such technical literature is always made available to the specialized dealer's shops together with other recommendations on service and vehicle's fitment charts so that the dealer can direct the right choice of the customer for any given type of super-car.
In conclusion any additional information will be useless and misleading for the customer as well as insufficient for the specialized dealer.
The only usefulness for the additional information will just be for marketing and advertising.

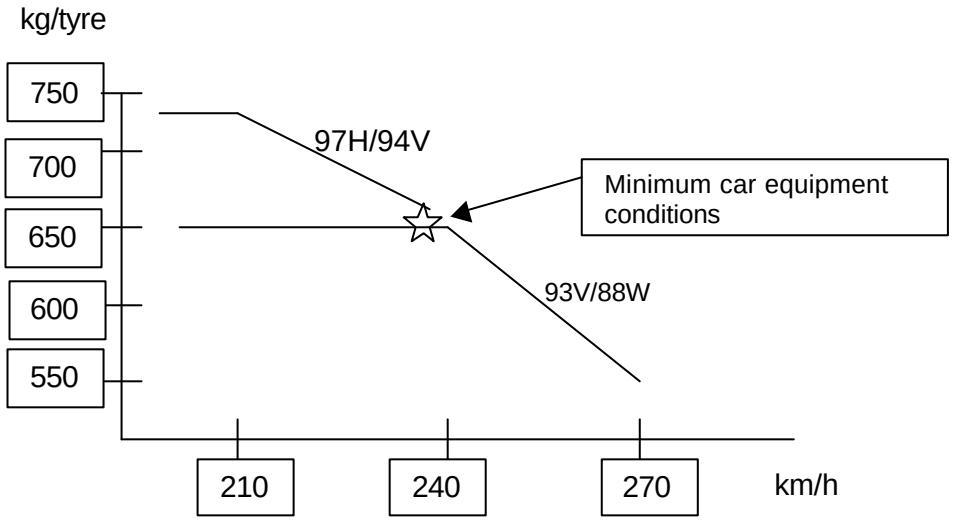
Yours Sincerely,

Léon Chession
Secretary General

32 Av. Brugmann – Bte 2 – B-1060 Brussels, Belgium – Tel. ++32-(0)2-344 40 59 – Fax. +32-(0)2-344 12 34
E-mail : info@etrto.org – Internet : http://www.etrto.org

ANNEX 1

Question: how can he verify that the tyre is the 'right' tyre for the vehicle ?



32 Av. Brugmann – Bte 2 – B-1060 Brussels, Belgium – Tel. ++32-(0)2-344 40 59 – Fax. +32-(0)2-344 12 34
E-mail : info@etrto.org – Internet : http://www.etrto.org