

Draft Amendment to

PROPOSAL FOR COLLECTIVE AMENDMENTS TO
REGULATIONS NOS: 30, 54, 75, 108 and 109 (Part I)
REGULATIONS NOS: 78 and 90 (Part II)

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A.1. PROPOSAL

Regulation No. 30 – Pneumatic tyres (motor vehicles and their trailers)

Paragraph 1., amend to read (including the deletion of footnote */ and the third sentence of the paragraph):

"1. SCOPE

This Regulation applies to new pneumatic tyres. **This tyres are intended for to fitting of vehicles of category ~~M₁, O₁ and O₂~~ M, N, L and O with a maximum design speed of not more than 300 km/h.**

~~It does not apply for tyres designed for:~~

~~(a) the equipment for vintage cars~~

~~(b) competitions."~~

B.1. JUSTIFICATION

1. The text " ... designed primarily, but not only, for ..." is ambiguous and could exclude components "designed only for ...".

This new wording cleared, that the type approval is only for the tyre and it is permitted to fit this kinds of tires on Vehicles of categories M, N L and O. The restriction of M₁, O₁ and O₂ is not only not necessary but would prepare problems to equipped N-or O -vehicles with tyres. A finer partition is not necessary, because performance data of the tire limit the use range automatically.

2. The speed limitation should be properly introduced in the scope in order to make sure that tyres for vehicles running faster than 300 km/h cannot be approved according to this Regulation.

3. delete

~~(a) Tyres are expendable parts and a vintage car need exactly like a newer vehicle~~

~~from time to time new tyres and it is no mistake to fit this kind of cars with safe tyres.~~

~~(b) Some categories of competitions cars need a registration for the public road traffic and in~~

~~this connection approved tyres.~~

It is not necessary to named explicit this kinds of cars, because its not relevant for the type approval of the tyre.

A.2. PROPOSAL

Regulation No. 54 – Pneumatic tyres (~~heavy commercial~~ vehicles and their trailers)

Paragraph 1., amend to read (including the deletion of footnote */):

"1. SCOPE

This Regulation applies to new pneumatic tyres. This tyres are intended for to fitting of vehicles of category ~~M₂, M₃, N, O₃ and O₄~~ M, N and O. However, it does not apply to tyre types identified by speed category symbols corresponding to speeds below 80 km/h."

B.2 JUSTIFICATION

The text "... designed primarily, but not only, for ..." is ambiguous and could exclude components " ... designed only for ...".

As is the case for the Regulation No 30 the kinds of tire do not ever correspond with the category of vehicles.

As practical example would be to be called:

DC Sprinter, - The vehicle has fitted the same tires up as N1 with 4,8t total mass like also as M1 with 4,8t total mass. Indeed tires in accordance to Regulation 54.

A finer partition is not necessary, because performance data of the tire limit the use range automatically

A.4. PROPOSAL

Regulation No. 108 – Retreaded pneumatic tyres for motor vehicles and their trailers

Paragraph 1., amend to read:

"1. SCOPE

This Regulation applies to the production of retreaded tyres. This tyres are intended for to fitting of vehicles of category ~~M₁, O₁ and O₂~~ M, N, L and O. It does however not apply to the production of:"

Paragraphs 1.1. to 1.3., should be deleted.

Paragraphs 1.4. to 1.8. (former), renumber as paragraphs 1.1. to 1.5.

B.4. JUSTIFICATION

1. Wherever possible, it should be referred to the vehicle categories of R.E.3 Annex 7.

2. It is not clear what "private passenger cars" are. The word "private" is not really helpful as it relates to the ownership or use status of the vehicle.

3. It is even unclear what "their trailers" are. Including ~~O₁ and O₂~~ O here would be in line with Regulation No. 30.

4. Paragraphs 1.1. and 1.3. are superfluous.

This new wording cleared, that the type approval is only for the production of retreaded tyre and it is permitted to fit this kinds of tires on Vehicles of categories M, N L and O. The restriction of M₁, O₁ and O₂ is not only not necessary but would prepare problems to equipped N-or O -vehicles with tyres. A finer partition is not necessary, because performance data of the tire limit the use range automatically.

A.5. PROPOSAL

Regulation No. 109 – Retreaded pneumatic tyres for ~~commercial~~heavy vehicles and their trailers

Paragraph 1., amend to read:

"1. SCOPE

This Regulation applies to the production of retreaded tyres. This tyres are intended for to fitting of vehicles of category M, N and O ~~M₂, M₃, N, O₃ and O₄~~. It does however not apply to the production of:"

Paragraphs 1.1. to 1.3., should be deleted.

Paragraphs 1.4. to 1.8. (former), renumber as paragraphs 1.1. to 1.5.

B.5. JUSTIFICATION

1. Wherever possible, it should be referred to the vehicle categories of R.E.3 Annex 7.

2. It is not clear what "commercial vehicles" are. The word "commercial" is not really helpful as it relates to the ownership or use status of the vehicle.

3. It is even unclear what "their trailers" are. Including ~~O₃ and O₄~~O here would be in line with Regulation No. 54.

4. Paragraphs 1.1. and 1.3. are superfluous.

This new wording cleared, that the type approval is only for the production of retreaded tyre and it is permitted to fit this kinds of tires on Vehicles of categories M, N and O. The restriction of M₂, M₃, N₁ O₃ and O₄ is not only not necessary but would prepare problems to equipped N-or O -vehicles with tyres. A finer partition is not necessary, because performance data of the tire limit the use range automatically.