

## Issues raised to the draft UN Regulation on studded tyres

### 1. Para. 4.2.1. – Appropriateness of the use of the “Alpine” symbol

It looks like the objective of this UN Regulation is to allow studded tyres to bear the “Alpine” mark, although those tyres are excluded from the scope of UN Regulation No. 117.

The “Alpine” mark seems not appropriate for the UN Regulation on studded tyres, as it is relevant to UN Regulation No. 117. The idea to develop a separate UN Regulation for studded tyres came after the fact that those tyres cannot be included in the scope of UN Regulation No. 117.

It looks like that another appropriate marking confirming performance of studded tyres in snowy conditions should be implemented.

### 2. Para. 4.2.1. – Correctness of logic

Para. 4.2.1. states that tyres shall bear the «Alpine symbol».

However, there is no indication that to bear this (or another similar) mark tyres shall meet the specifications of this UN Regulations.

It is proposed to amend the wording similarly to UN Regulation No.117, para. 4.2.6.: «The "Alpine" symbol ("3-peak-mountain with snowflake" conforming to the symbol described in Annex 7, Appendix 1) shall be added if the snow tyre is classified as "snow tyre for use in severe snow conditions".

To reflect on that, para. 4.2. could be corrected as follows: «In particular tyres **meeting the requirements of paragraphs 6. and 7. below**, shall bear:<sup>4</sup>».

### 3. Para. 6.1. - Specifications

Para. 6.1. reads: «The studded tyre shall meet the performance requirements of paragraph 6.4. of UN Regulation No. 117, when tested according to Annex 7 to UN Regulation No. 117 without studs».

It has to be indicated in Section 3 «Application for approval» that the tyre samples have to be submitted for tests with the removed studs (or in studable condition).

The assumption is that if a tyre without studs had passed the test, the same tyre will pass the tests when studded as studded tyres perform on the snowy surface better than not studded ones.

The consequence of this approach is that a tyre passed the test may be studded arbitrarily: any number of studs of any mass with any disposition on a tyre. The only limitation is that the applicable stud model shall be listed in the approval documentation.

Would that be reasonable to restrict the number of studs to be mounted on a tyre, stud weight, dimensions, etc.?

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