



# **DETA - Unique Identifier – Tyre Industry Perspective & Questions**



- **ECE-TRANS-WP.29-178-24e**

- DETA - UI Guidelines –
- “Endorsed” by WP.29 in June 2019

Where is the official document stored?

85. WP.29 took note of the specifications and application guidelines for UI and DoC (WP.29-178-24, WP.29-178-25 and WP.29-178-26/Rev.1) and requested the secretariat to issue them as official documents.

- **ECE-TRANS-WP.29-2019-77e**

What is its status?

- OICA Proposal for UI guidelines
- Includes two subparts
  - Specifications of Unique Identifier Module in DETA
  - Guideline for application of the Unique Identifier (similar to ECE-TRANS-WP.29-178-24)
- Not discussed or adopted by WP.29

- **DETA-35-11e Rev 1 (UI Q&A)**

What is its status?

- Submitted but not discussed during 35<sup>th</sup> DETA IWG

# R30/R54 and R117 - Type of Tyre Definitions



Type of tyre means tyres which do not differ in **such** essential characteristics **as**:

<b>R30/R54</b>	<b>R117</b>
Manufacturer's name	Manufacturer's name
(inherent due to the other items)	Tyre class
<b>Tyre-size designation</b>	
Category of use	Category of use
Structure	Structure
<b>Speed category symbol</b>	
<b>Load-capacity index</b>	
	Whether tyre for use in severe snow conditions or not
	<b>C2, C3: whether Traction or not?</b>
<b>Tyre cross-section</b>	
	<b>Tread pattern</b>

› The characteristics defined in the regulation consist of the minimum set of characteristics defining a type. Usually additional ones are defined by each tyre manufacturer in agreement with its TAA.

e.g.: segregation by brand name and commercial name, as explicitly indicated in the Application Form in R30.

# R117 Example



- Several tyre type designations according R30 may share the same tread pattern and have the same R117 type approval number

1.	Manufacturer's name and address	: BRIDGESTONE EUROPE NV/SA Kleine Kloosterstraat 10 1932 Zaventem, Belgium
2.	If applicable, name and address of manufacturer's representative	: -
3.	'Tyre class' and 'category of use' of the type of tyre	: Class: <b>C1</b> Category of use: <b>Snow</b>
3.1.	Snow tyre for use in severe snow conditions	: <b>yes/no</b> <sup>(1)</sup>
3.2.	Traction tyre	: <b>yes/no</b> <sup>(1)</sup>
4.	Tyre type designation	:
4.1.	Brand name(s)/trademark(s) of the type of tyre	: DAYTON-SEIBERLING-SAETTA
4.2.	Trade description(s)/Commercial name(s) of the type of tyre	: DAYTON DW510-DAYTON DW510 EVO-SEIBERLING WINTER-SAETTA WINTER
5.	Technical service and, where applicable, test laboratory approved for purposes of approval or of verification of conformity tests	BRIDGESTONE EUROPE : NV/SA ITALIAN BRANCH TECHNICAL CENTER Via del fosso del Salceto13/15, 00128 Rome – ITALY
6.	Performance(s) approved	: sound level at (stage 1/stage 2) <sup>(1)</sup> , wet adhesion level, rolling resistance level (stage 1/stage 2) <sup>(1)</sup>

# R30 Example



- A tyre type designation according R30 may have different R117 numbers, for example due to different tread patterns with different trade descriptions

1. Manufacturer's name and address	:	Continental Reifen Deutschland GmbH Vahrenwalder Str. 9 30165 Hannover Germany
2. Tyre type designation <sup>(2)</sup>	:	
2.1 Brand-name(s)/trademark(s)	:	GENERAL, VIKING, CONTINENTAL, BARUM, UNIROYAL, GISLAVED <u>PLATIN</u>
2.2 Trade description(s)/Commercial name(s)	:	UNIROYAL, RAINSPORT 3 BARUM, Bravuris 3 HM GENERAL, ALTIMAX SPORT CONTINENTAL, PremiumContact 6 GISLAVED, ULTRA*SPEED 2 VIKING, ProTech NewGen <u>PLATIN, RP420 SUMMER</u>
3. If applicable, name and address of the manufacturer's representative	:	not applicable
4. Summarized description	:	
4.1 Tyre size designation	:	215/40 R 17
4.2 Category of use	:	normal / <del>snow</del> / <del>special use</del> / <del>temporary use</del> <sup>(1)</sup>
4.3 Structure	:	<del>diagonal</del> / <del>bias belted</del> / radial / <del>run flat tyre</del> <sup>(1)</sup>
4.4 Speed category symbol	:	Y
4.5 Load-capacity index	:	87



- Tyres may be certified with
    - R30/R54/R75/R106 type approval number only (exempted from R117)
    - R30/R54 and R117 type approval numbers
    - R30/R54 type approval number and by extension of the R30/R54 type approval a suffix indicating the R117 stage (S2WR2)
  - For one SKU (stock-keeping unit), it is possible to have several R30 numbers
  - Several SKU's may share the same combination of R30 and R117 numbers
  - There is no one-to-one relation between the type characteristics as combined based on R30/R54 and R117 and the combinations of R30/R54 and R117 approval numbers
- ➔ We cannot base the product *attributes* definition on the combined tyre type characteristics

**It was proposed to define the *product* as the unique combination of type approval numbers BUT...**

# Reminder : 1958 Agreement Requirements



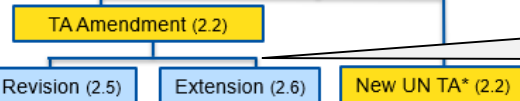
## • Schedule 3 – Procedures for UN Type Approvals

- **1.2: Only one application** may be submitted for a **particular type** of vehicle, equipment or part and it may be submitted in only one Contracting Party applying the UN Regulations pursuant to which UN Type Approval is sought. A **separate application shall be submitted for each type to be approved.**
- **2. Amendments to UN Type Approval (Certification)**

What is a change in particulars of the type?

Manufacturer informs TAA of any change in the particulars of the type as recorded in the information document (2.1)

TAA to decide of the procedure based on conditions (2.2)



Following latest published supplement

Conditions	Change in particulars of the type as recorded in the information document and test reports (2.5)			
	Yes	Yes	Yes	
The type still complies with requirements of UN Reg concerned (2.5)	Yes	Yes	No	
Changes will have appreciable adverse effect on the environment/safety performance (2.5)	No	No	Yes	
Further inspections or tests required (2.6) Or Change of information on TA certificate (= communication document) Or Approval to a later series of amendments into force, <u>provided that</u> requirements of a later SoA are fulfilled	No	Yes	-	
To do	Upon TAA request, carry out inspections or tests (2.4)	Yes	Yes	Usual TA process
	Revise <u>informat. docs</u> /tests reports as necessary, marking each rev page + date of re-issue (2.5)	Yes	Yes	
	Consolidated, updated information document, with detailed description of modification (2.5)	Yes	Yes	
	Update Approval Number w/ extension number incremented + revised TA certificate (2.8)	No	Yes	
	Communication of amendment to UN TA to CP by TAA (2.7)	Yes	Yes	

Some examples:

- Adding SKU to the list of SKUs in R30 (different brand/commercial name): revision
- EMT marking: extension or new TA
- R117 revised C1 WG test method: revision or extension

# UNECE Unique Identifier – Analyse of scenarios Annex 1



**Example 1:** Introduction of a new series of amendment in R117 → R117.03  
 Modification of the product needed which exceeds its type definition (UI Guidelines - Annex I, 4)

<u>Before</u> new Series of Amendment		<u>After</u> New Series of Amendment	
Type approval Number	Combined UI	Type approval Number	Combined UI
E4*30R02/21*987654*00 E4*117R02/11*123456*00 S2WR2	UI 10000001	E4*30R02/21*987654*00 E4*117R <b>03/00*234567</b> *00 S2WR2 <b>X1</b>	UI 10000006

**Marking:**

E4 02987654 S2WR2 <b>or</b> E4 02987654 02123456 S2WR2	UI 10000001	E4 02987654 S2WR2 <b>X1</b> <b>or</b> E4 02987654 <b>03234567</b> S2WR2 <b>X1</b>	UI 10000006
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→ new R117 type approval number → new combination of type approval numbers → **NEW UI**

Need to have a better understanding on what is intended by “exceed type definition”?

What about the suffixes?

They are not part of the type approval number (R117 - 5.2).

Still to be added to UI #? UI marking?



# UNECE Unique Identifier – Analyse of scenarios Annex 1



**Example 2: Introduction of a new series of amendment in R117 → R117.03**  
**Modification of the product NOT needed (UI Guidelines - Annex I, 5)**

If product not modified, it implicitly meet requirements of regulation stage 03 while first type approval granted under regulation stage 02

<u>Before</u> new Series of Amendment		<u>After</u> New Series of Amendment	
Type approval Number	Combined UI	Type approval Number	Combined UI
E4*30R02/21*987654*00 E4*117R02/11*123456*00 S2WR2	UI 10000001	E4*30R02/21*987654*00 E4*117R <b>03/00</b> *123456* <b>01</b> S2WR2 <b>X1</b>	UI 10000001

### Marking:

E4 02987654 S2WR2 or E4 02987654 02123456 S2WR2	UI 10000001	E4 02987654 S2WR2 <b>X1</b> or E4 02987654 <b>03</b> 123456 S2WR2 <b>X1</b>	UI 10000001
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As per UI guidelines annex 1 case 5, extension of existing R117 type approval number → UI unchanged

→ Same UI but **TWO combinations of type approval numbers**

→ **Inconsistency with current definition of product**

How to distinguish between both combinations of *stricto sensu* type approval numbers as defined in 58A?''



**Need to review the definition of product?**

# UNECE Unique Identifier – Analyse of scenarios Annex 1



**Example 3:** Introduction of a new series of amendment in R117 → R117.03  
 Modification of the product needed but not exceeding its type definition (UI Guidelines - Annex I, 6)

Before new Series of Amendment		After New Series of Amendment	
Type approval Number	Combined UI	Type approval Number => extension	Combined UI
E4*30R02/21*987654*00 E4*117R02/11*123456*00 S2WR2	UI 10000001	E4*30R02/21*987654*00 E4*117R <b>03/00</b> *123456*01 S2WR2 <b>X1</b>	UI 10000006
<b>Marking:</b>			
E4 02987654 S2WR2 <b>or</b> E4 02987654 02123456 S2WR2	UI 10000001	E4 02987654 S2WR2 <b>X1</b> <b>or</b> E4 02987654 <b>03</b> 123456 S2WR2 <b>X1</b>	UI 10000006
→ Extension of R117 type approval number but <b>new UI</b>			

Which cases in regulations tyre related?  
 Need to define “exceed type definition”?

How can we have a new marking when section 3 of  
 type approval number is not changed when  
 extending a type approval?



**Example 4:** Run Flat tyre non RF (sup 20) meeting EMT requirements converted to EMT (Sup 21)  
 → New extension to declare EMT pursuant to supplement in force (Sup 21)  
 Modification of the product NOT needed (UI Guidelines - Annex I, 5?)

Before extension		After extension	
Type approval Number	Combined UI	Type approval Number → extension	Combined UI
E11*30R02/20*23220*00 R117 #1	UI 10000001	E11*30R02/ <b>21</b> *23220* <b>01</b> R117 #1	UI 10000001
<b>Marking:</b>			
E11 0223220+02S2WR2	UI 10000001	E11 0223220+02S2WR2 <b>EMT pictogram</b>	UI 10000001 <b>EMT pictogram</b>
→ Extension of R30 type approval number but <b>UI unchanged</b>			

The UI will redirect to 1/ tyres meeting EMT requirements, but not bearing the EMT pictogram, and to 2/ tyres meeting EMT requirements with EMT pictogram.

- The proposal to consider sections 1&3 in the product definition is not valid as it would imply a non-compliance for tyres under 1/ ?
- Additional criteria in product definition such as “sections 1 & 3 of TA number and no regulatory pictogram associated to the performance”?



## Example 5: Tyre Family with two sizes initially type approved S2R2 R117 Sup 9

List of sizes are part of the communication form

E13*117R00*117R02*20354*01					
TIRE SIZE	STANDARD		ADDITIONAL		Brand/Trade description A
	LOAD	SPEED	LOAD	SPEED	
12.00R24	160/156	K			X
<b><u>325/95R24</u></b>	<b><u>162/160</u></b>	<b><u>K</u></b>			<b><u>X</u></b>
E13*117R02/10*20354*02					
tire size removed, not compliant to new supplement/reuquirements					
TIRE SIZE	STANDARD		ADDITIONAL		Brand/Trade description A
	LOAD	SPEED	LOAD	SPEED	
12.00R24	160/156	K			X
<b><u>325/95R24</u></b>	<b><u>162/160</u></b>	<b><u>K</u></b>			<b><u>X</u></b>



**Example 5: Tyre Family with two sizes initially type approved S2R2 R117 Sup 9**

→ New extension to declare WG for only one size that was already meeting WG requirements at time of initial TA pursuant to supplement in force (Sup 10) & to new approval number format according to schedule 3. Second size production is definitely discontinued.

Modification of the product NOT needed (UI Guidelines - Annex I, 5?)

Before extension		After extension	
Type approval Number	Combined UI	Type approval Number → extension	Combined UI
E11*117R00*117R02*20354*01	UI 10000001	E11*117R02/10*20354*02	UI 10000001
<b>Marking:</b>			
E11 20354 S2R2	UI 10000001	E11 20354 S2WR2	UI 10000001
→ Extension of R117 type approval number but <b>UI unchanged</b>			

The UI will redirect to 1/ tyres meeting WG requirements but not bearing the “W” and to 2/ tyres marked “W”

→ similar question than for EMT

One size is not listed anymore → Is the initial certificate still valid for this size?

# Revised product definition proposal

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## UI Guideline - Article 5:

For the purpose of Unique Identifier, a product is a physical object or a group of physical objects consisting of one or more approved systems, components, equipment or part and is identified ~~by a single type approval number or~~ by a unique combination of **[sections 1 and 3]** of type approval number(s), as is typically for lamp units.

For other products: There can only be one UI assigned to a product and one UI applies to one product only.

For tyres: There can only be one **combined UI** assigned to a product and one **combined UI** applies to one product only.

A combination may contain one single or multiple type approvals

Nonetheless, different products may incorporate some components with the same type approval numbers.

To each type approval number that is uploaded to the secure internet database a UI is assigned.

On request of the manufacturer to the type approval authority a UI can be assigned to a combination of approval numbers provided that all of them have been assigned to that manufacturer.



Our understanding is that:

- On existing products, it will be allowed/required to replace UNECE type approval markings by UI
- Acceptance of UI as a marking could be an issue:
  - E.g. some countries provide that tyres must bear “SWR marking”
  - E.g. some countries insist on “E4” marking → [See RF proposal](#)
  - E.g. some countries require a part that must be type approved to bear the approval marking

Some questions:

- What is the process to apply for UI? → [Defined in UI guidelines](#)
- Who is responsible to make the necessary combinations, when a UI combines several type approval numbers? → [Defined in UI guidelines for new approvals](#). **Not clear for extensions.**
- Will we have to indicate the UI for each tyre on the R117 tyre list and/or the R30/R54 certificate? **Not recommended because of additional administrative burden for Tyre manufacturer**
- Under which conditions will it be possible for TAA to pre-assign an UI in order to prepare moulds? → [Defined in UI guidelines](#)



## Further questions:

- Has the concept of UI already been communicated to other countries accepting UN Regulations, e.g. Israel, especially for industries adopting UI marking?
- Who should communicate and at what level?
- What will be the DETA access rights for these countries?
- Timing for these access rights be discussed in DETA IWG and WP.29?
- ...





**Thank you**