



DETA & Unique Identifier (UI)

Tire industry perspective and questions

This document aims to summarize the content of 39-06e and relates to the guidelines defined in 35.09 Rev 1.



Annex 1

General guidelines on the use of the UI in case of modifications of approved products or of UN Regulations.

	Product status	Regulation update	Impact on approval	Impact on conventional UN type approval marking	Impact on UI marking (when database is available)
1	New product	-	New approval	Approval no('s) issued UN type approval marking(s) on the new product	Approval no('s) issued and linked to a UI UI marking on the new product
2	Modification of the product with no impact on approval	-	No impact	No impact	No impact
3	Modification of the product with impact on approval but not exceeding	-	Extension required	No impact	No impact



4	Modification of the product which exceeds its type definition	-	New approval	New approval no('s) issued New UN type approval marking(s) on the modified product	New approval no('s) issued and linked to a new UI New UI marking on the modified product
5	No modification of the product. All variants of the product included in the original approval already comply with the new series of amendments of the UN Regulation	Update of UN Regulation, new series of amendments	Extension of approval with indication of the new series of amendments	New UN type approval marking(s) on the un-modified product to indicate <u>the new series of amendments</u>	No impact
6	Modification of the product and all or some of its variants to comply with the new series of amendments to the UN Regulation but not exceeding its type definition	Update of UN regulation, new series of amendments	Extension of approval with indication of the new series of amendments	New UN type approval marking(s) on the modified product	New UI marking



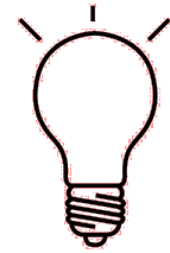
R30/R54 and R117 - Type of Tyre Definitions



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

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

Each tyre is subject to two regulations for which the type of tyre is determined by different characteristics



PRODUCT:	LAMP 1	LAMP 2	LAMP 3
R01 Type Approval #:	Cert 01	-	-
R02 Type Approval #:	-	Cert 02	-
R03 Type Approval #:	-	-	Cert 03
Lamp Assembly 1,2 Combined #:	Cert 01 + Cert 02 = UI 12		
Lamp Assembly 1,3 Combined #:	Cert 01 + Cert 03 = UI 13		
Lamp Assembly 2,3 Combined #:	Cert 02 + Cert 03 = UI 23		

Our understanding is that each Light type must comply with one single regulation, whereas for tires each tire must comply with multiple regulations simultaneously.



PRODUCT:	TIRE 1	TIRE 2	TIRE 3
R30 Type Approval #:	Cert 01	Cert 02	Cert 03
R117 Type Approval #:	Cert 04	Cert 05	Cert 06
Tire 1 multi-reg Combined #:	Cert 01 + Cert 04 = UI 14		
Tire 2 multi-reg Combined #:	Cert 02 + Cert 05 = UI 25		
Tire 3 multi-reg Combined #:	Cert 03 + Cert 06 = UI 36		

This example fits with Point 1 of Annex 1.



- Unlike light assemblies, a tyre is not an assembly.
- According to Article 5 of UI Guideline, *a product is a physical object or a group of physical objects and is identified by a unique combination of Type Approval number(s).*
- Physical tires could have different brands and/or commercial names even if they share the same unique combination of type approval numbers.



PRODUCT:	TIRE 1	TIRE 2	TIRE 3
R30 Type Approval #:	Cert 01	Cert 01	Cert 01
R117 Type Approval #:	Cert 02	Cert 02	Cert 02
Tire 1 multi-reg Combined #:	Cert 01 + Cert 02 = UI 12		
Tire 2 multi-reg Combined #:	Cert 01 + Cert 02 = UI 12		
Tire 3 multi-reg Combined #:	Cert 01 + Cert 02 = UI 12		

This example fits with Point 3 of Annex 1. *(extension to include new tire line name)*



- In general, we see no issue with Annex 1, Points 1,2 and 3.
- We propose to adapt the wording of UI Guideline - Article 5 as follows:
 - *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 parts and is identified ~~by a single type approval number or~~ by a unique combination of [sections 1 and 3, plus the regulation number specified in section 2] 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.*
- *Nonetheless, different products may incorporate the same 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.*



3. An approval number shall be assigned to each type approved. The type approval number shall consist of 4 sections. Each section shall be separated by the '*' character.

Section 1: The capital letter 'E' followed by the distinguishing number of the Contracting Party which has granted the type approval.

Section 2: The number of the relevant UN Regulation, followed by the letter 'R', successively followed by:

- (a) Two digits (with leading zeros as applicable) indicating the series of amendments incorporating the technical provisions of the UN Regulation applied to the approval (00 for the UN Regulation in its original form);
- (b) A slash and two digits (with leading zeros as applicable) indicating the number of supplement to the series of amendments applied to the approval (00 for the series of amendments in its original form);
- (c) A slash and one or two character(s) indicating the implementing stage, if applicable.

Section 3: A four-digit sequential number (with leading zeros as applicable). The sequence shall start from 0001.

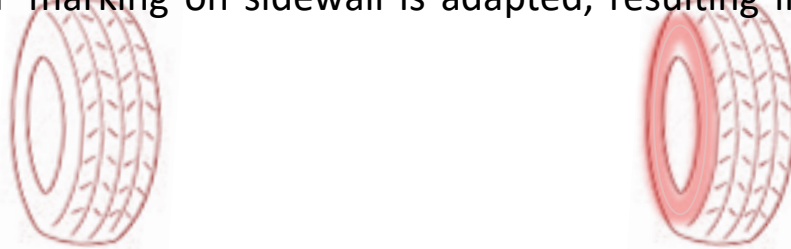
Section 4: A two-digit sequential number (with leading zeros if applicable) to denote the extension. The sequence shall start from 00.

E4*58R00/00*0004*02				
E4	58R00/	/00	0004	02
Section 1	Section 2		Section 3	Section 4
CP	UN Regulation, incl. Amendment	Supplement	sequential number	extension



Scenario: Introduction of a new series of amendment in R117 → R117.03
 Applicable Guideline: Annex 1, Point 4 (Modification of the product needed which **exceeds its type definition**)

Example: Traction / 3PMSF marking on sidewall is adapted, resulting in a change in 'Type of Tyre'.



PRODUCT:	TIRE 1 (Before)	TIRE 1 (After)
R30 Type Approval #:	E4*30R02/21*987654*00	E4*30R02/21*987654*00
R117 Type Approval #:	E4*117R02/11*123456*00 S2WR2	E4*117R03/00*234567*00 S2WR2X1
Part Marking:	E4 02987654 S2WR2 or E4 02987654 02123456 S2WR2	E4 02987654 S2WR2X1 or E4 02987654 03234567 S2WR2X1
Tire 1 multi-reg Combined #:	UI 01	UI 02



Scenario: Introduction of a new series of amendment in R117 → R117.03
 Applicable Guideline: Annex 1, Point 5 (Modification of the product **NOT** needed which exceeds its type definition)
 Example: Product has not changed, but we must demonstrate compliance with amended regulation



TIRE 1 is unchanged



PRODUCT:	TIRE 1 (Before)	TIRE 1 (After)
R30 Type Approval #:	E4*30R02/21*987654*00	E4*30R02/21*987654*00
R117 Type Approval #:	E4*117R02/11*123456*00 S2WR2	E4*117R03/00*123456*01 S2WR2 X1
Part Marking:	E4 02987654 + 02S2WR2	E4 02987654 + 03S2WR2 X1
	or E4 02987654 E4 02123456 S2WR2	or E4 02987654 E4 03123456 S2WR2 X1
Tire 1 multi-reg Combined #:	UI 01	UI 01

Annex 1, point 5 specifies no change to UI in contradiction, with the current definition a change in the approval number requires a new UI, which is why we propose to limit the changes as proposed.



Assembly Product:	Single Product:	Regulation:	UI	Combined UI
Light Assembly	Lamp 1	Regulation x?	UI 1	combined UI
	Lamp 2	Regulation y?	UI 2	
	Lamp 3	Regulation z?	UI 3	
-	Tyre	Regulation R30 - Type Approval Number 1	UI 1	combined UI
		Regulation R117 - Type Approval Number 2	UI 2	

- Based on the examples and scenarios shown, for UI to be relevant to tyres, the wording of UI Guideline - Article 5 should be adapted as proposed:

- 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 parts and is identified ~~by a single type approval number or~~ by a unique combination of **[sections 1 and 3, plus the regulation number specified in section 2]** 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.



END