

TF-R39 10th Session

20240923

Chair : welcome everyone

Introduction to the meeting, short history of the origin of this task force.

Outcome of the meetings were 2 documents, a formal document submitted to GRSG in July and an informal document which amends the formal document in several aspects.

The formal document proposes a 02 series of amendments.

- New requirements on odometer accuracy, including a type approval test
- Anti-tampering of odometer requirements, requirements according to R155, however not requiring type approval
- Malfunction indicator of the odometer
- Exemption of L category for some requirements, except odometer accuracy

Several editorial changes have been made in addition.

Remaining items within brackets are the transitional provisions, odometer accuracy. Currently proposed 2027 and 2028 for NT and AT. OICA introduced alternative TPs, 2030 and 2033 for NT and AT. Main reason is the technical requirements on odometer accuracy and malfunction indicator of odometer.

Meeting Notes

Introduction

Chair (Tim Guiting) : any general remarks?

OICA : we also want to propose to add the wording of 'at the time of type approval' for odometer accuracy requirement in § 5.8.

Chair : ok, we can discuss this after the main discussion

10. Transitional provisions

OICA : our main concern for the transitional provisions is the malfunction indicator of odometer. We don't know at the moment which technical adaptations we have to do to our platforms to be able to comply with this. For the anti-tampering requirement we also need to check the existing vehicle types if they can be compliant with R155 and in what timeline. Additionally the odometer accuracy, mainly the tyre dimension which is in the control of the tyre manufacturers, for which there is no regulation on dimension accuracy at the moment.

Chair : any comment on OICA's proposal?

NL : For the Netherlands it is important to have TP in accordance with our expectations. We are willing to look at some exemptions to all the requirements (for example for the malfunction indicator of the odometer). We think that the 2027, 2028 are realistic. We are willing to accept a 1 year delay for NT and AT, and even more for the malfunction indicator.

We want to introduce new requirements for having a level playing field.

OICA : for a few problems seen by contracting parties, there seems to be no concern from customers. Also for these vehicles we need to modify them for all type approvals as indicated in the TP.

Could you also indicate why the introduction is needed so urgently?

NL : In R39 01 series the odometer was introduced. The requirements on odometer should have been introduced in those 01 series. The requirement was only to have an odometer, but no requirements on accuracy or anti-tampering. So there has been a long time since introduction of odometer and therefore the introduction of accuracy and anti-tampering requirements should not pose any issue.

OICA : It is interesting to hear that this should have been introduced since 01 series. There was no consensus and there was no need for the introduction. We can also not show any value as odometer value, because that would not be accepted by customers. Also there is no safety issue, there is no evidence that there is any basis for accidents based on inaccurate odometer values.

There are already a lot of warning signals in the vehicle, and this additional warning will aid to distraction of drivers. Regarding tyres : all the tyres (not only in EU, but all markets) should have a regulation which would regulate its dimensions.

Chair : regarding tyres, SAE was proposing that 2.5% is the inaccuracy of the tyres. We augmented this to 4 % for inaccuracy on the whole vehicle system regarding odometer.

Germany : we support the understanding of Netherlands

NL : we keep coming back to the accuracy, the +- 4% means 8% possible variance. We only talk about new tyres that OEMs put on the vehicles in production. We have to keep in mind that consumers will replace tyres, tyre wear, so in real life the tolerance is bigger. Therefore at type approval we need to keep this tolerance as low as possible.

OICA : SAE indeed gave the 2.5%, however they did not propose a timeline for when this would be possible. They also were not included in the discussions for this amendment.

All tyre manufacturers putting out tyres on the market all over the world need to be able to guarantee the same accuracy.

UK : Thank you for the explanation. We would like to see this new series to be implemented as soon as practically possible. We think OICA's proposal to be too far in the future. We would also be willing to delay the timing as in the current proposal, in accordance with Netherlands. If the tyre industry would be able to bring information to GRSG, that would be very helpful.

Sweden : we don't have a firm position at this time. We are discussing this item internally. We agree with OICA on the item that this is not a safety issue, and therefore enough time should be given to have a good implementation.

Chair : there was a link with safety issues in the beginning of the discussions, but no clear deduction

OICA : there is no regulation on tyre dimension (circumference). There is already difference between ETRTO and JATMA on the measurement. They have guidelines, but they are not similar. Outside of these 2 organizations, we don't know the situation in other parts of the world.

SAE proposal is only for USA, not for other markets.

ETRTO mentioned that +-5% was a bit ambitious.

Chair : I'm not sure that we need a regulation on tyre dimensions. But I understand your view.

OICA : this regulation applies to all categories of vehicles, and for smaller manufacturers it is not easy to dictate the conditions of the tyres to the tyre manufacturers (same as for other parts)

NL : smaller manufacturers do not include many tyre size variations. For a bigger manufacturer, they include more variations of tyre, rim sizes. The issue is that different tyre variations and brands of tyres want to be included in a type approval, and that is why you need a wider tolerance. In real life it will be bigger for customers who install for example a different brand of tyre.

OICA : we have different parameters for speedometer/odometer regarding different tyres which can be mounted on our vehicles

Chair : we don't seem to get closer to a solution. We understand the position of OICA for asking for the longer TP dates. Some CPs want to delay the introduction for 1 year compared to the current dates in square brackets. We don't get any new information in this meeting to bring more clarity to the discussions. Should we continue the discussion in GRSG?

NL : we can continue to discuss this in GRSG. As mentioned we can agree with 2028 and 2029 for NT and AT, and with a special clause for malfunction indicator, with a longer transitional provision.

Germany : we can agree with further discussion in GRSG

OICA : we want to indicate that a 2 year delay between NT and AT would be preferable.

5.8. odometer accuracy

Chair : now we can discuss on the proposal by OICA on § 5.8.

OICA : we want to introduce 'at the time of type-approval', because for us it might be clear in this group, but for other member states, or for member states who copy paste the regulation into their national regulation.

Chair : what you mention is indeed in line with the justifications. I have no opposition to this addition.

Any objections?

UK : We had a debate on in-use provisions in UK. If this is introduced into the regulation, that could create a problem. CP would need to come up with requirement for requirements on in-use.

OICA : This only is in relation to odometer, not speedometer. During the discussion in the task force, it was always with the understanding that this has to be confirmed during the time of type approval. If we don't add this here, then the requirement for speedometer would only need to be complied with at type approval, and not during its lifetime, compared to the odometer accuracy requirement.

The justifications will disappear and this understanding will fade away.

NL : the vehicle manufacturer cannot be responsible for a customer changing the tyre with a tyre which is not under the type-approval provisions.

I would like to hear the understanding on conformity of production of participants here.

OICA : I agree with it being applicable in COP requirements as well. Our intention is also to comply with the requirements during COP.

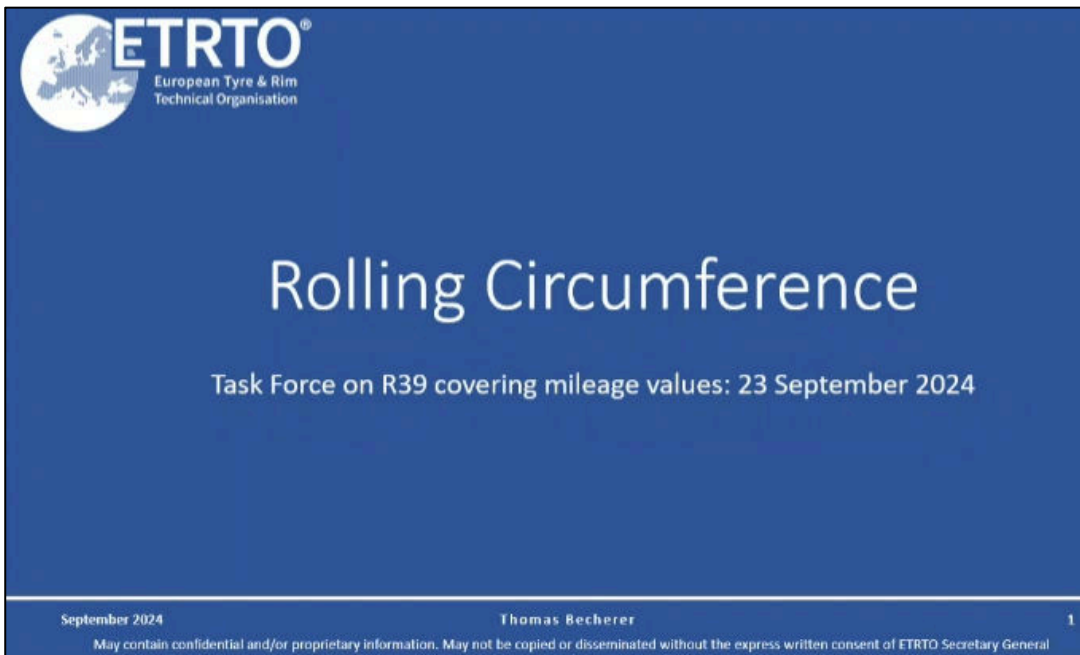
Chair : we heard several positions. We don't have a consensus on introducing it. So I suggest that OICA introduces this at GRSG, keeping in mind the comments from UK and NL.

This was everything that we wanted to talk about.

ETRTO Rolling Circumference

ETRTO : we would like to show 2 slides on the impact of tyre on odometer

Document on UN Wiki : <https://wiki.unece.org/download/attachments/262471998/TF-R39MV-10-02%20ETRTO%20Theoretical%20Rolling%20Circumference%2020240923.pptx?api=v2>



The slide features the ETRTO logo (European Tyre & Rim Technical Organisation) in the top left corner. The main title is 'Rolling Circumference' in a large white font. Below it, the subtitle reads 'Task Force on R39 covering mileage values: 23 September 2024'. At the bottom, there is a footer with the date 'September 2024', the name 'Thomas Becherer', and a small number '1'. A disclaimer at the very bottom states: 'May contain confidential and/or proprietary information. May not be copied or disseminated without the express written consent of ETRTO Secretary General.'

Definition of Theoretical Rolling Circumference

DESIGN GUIDE – *Passenger Car Tyres*

THEORETICAL ROLLING CIRCUMFERENCE

The following formula for Theoretical Rolling Circumference, FOR REGULATION PURPOSES ONLY, is given as a guide to vehicle manufacturers to cover E.T.R.T.O. Members' tyres, on a flat surface, including M + S Tyres.

$$C_R = F \cdot d$$

Where C_R = Theoretical Rolling Circumference

F = 3.05 (3.07 for Temporary Use Spare Tyres)

d = Design Overall Diameter

Basis: 60 km/h
E.T.R.T.O. Maximum Load
E.T.R.T.O. Reference Inflation Pressure

For specific vehicle approval purposes if other conditions apply, consult the tyre manufacturer.

EDI 2024, PC.8

This value is only to have an estimation on the rolling circumference. There is no tolerance on this value. The "basis" (speed, load, pressure) is a set of conditions at which the theoretical rolling circumference is valid. Changing these conditions also changes the theoretical rolling circumference.

ETRTO Statements

- The rolling circumference is not directly related to the overall diameter. It is not straightforward to estimate the variations between different products, even within the same tyre size.
- Establishing reliable data on the tolerances of the rolling circumference would be a major exercise.
- Reducing the tolerances on the odometer from the current state could severely affect the interchangeability of tyres.
- The effect of changing the tyre size on the vehicle is not even considered in the estimation.

The rolling circumference is not directly related to the overall diameter. Even within same tyre size, there is no reliable data available.

We estimate an impact if the tolerances are reduced on the possibility of changing tyre types.

Chair : thank you for your contribution. Can you send the document to the secretary?

ETRTO : yes, of course.

Chair : any questions or comments?

OICA : if we reduce the current estimated 5% tolerance on tyre to 4%, what would be the impact and the timeline?

ETRTO : we need time to investigate, and we have not estimated the time needed to introduce this. We only represent EU, but we would be discussing this topic with other tyre organizations in the future.

NL : I wonder if it is relevant for the discussion at this point. There is no regulation on tyres as we know, ETRTO presents a standard. In the future we would need discussion on real life influence on tyre tolerances. But we don't think this discussion is needed at this time, because we are only considering at the time of type approval.

ETRTO : we see already in discussions today between tyre manufacturers and vehicle manufacturers, they take the theoretical value already in consideration for their vehicle design

OICA : the proposed theoretical value is only in consideration of passenger cars, but not for other categories of vehicles

Conclusion

Chair :

- We discussed the TPs. Some CPs mentioned that a year later of introduction time would be acceptable.
- There was a presentation by ETRTO on circumference tolerance.
- OICA can propose a document regarding the proposal on § 5.8.
- We decided to continue the discussion during GRSG.