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Sent: 12 November 2018 10:35

To: 'GTB-Geoff Draper'

Cc: Sven.Paeslack@kba.de; Rovers, Derwin

Subject: RE: Invitation to the 33rd IWG on DETA meeting on 8 November in Geneva

Dear Geoff,

For your information: with regard to the 'guidelines on the application of the Unique Identifier', ETRTO had some additional comments, see below.

We didn't discuss it further during the meeting but decided to have a separate session in Brussels. Mr. Becherer from ETRTO will send out invitations for this meeting, somewhere in Brussels, around January.

"Our main clarification request is still related to the concept of "product" because we don't understand how the definition given in article 4. (a) may be put in relation to the concept of "type" of tyre.

Some other questions related to the concept of product have been raised by our members:

- Is a UI just associated to a unique combination of tyre approval numbers ?
- If you have several articles/SKUs which are marked today with the same combination of type approval numbers, will all of them in the future be marked with the same UI ? Could it be an option to mark them with different UIs ?
- Is the concept of "product" the same for all tyre regulations or will it be defined specifically, based on the regulations scope?
- We would like also to understand, in relation to article III, 8 (a) what is the "minimum set of attributes". Again, will this minimum set of attributes be unique for any product or will it be specific to the product itself?
- Is the UI regarded as an approval number ? Because many countries, also non 1958 agreement, require an approval number to be marked on the article.
- How will retreaded tyres be managed in regards to UI?

Also we would be grateful to get further clarification on the process for UI application.

In article III, 8, it is mentioned that "The approval authority where a manufacturer applies for type approval for his product is responsible for issuing the UI". Are you referring to the application for type approval in regards to UN regulations or to a specific type approval for UI? In such a case, how will the application for UI be documented? Together with the type approval according to UN regulations or in a separate process?

In the case of a "part/component" equal to a "product", if the minimum set of attributes is complete in DETA, will the UI be automatically generated or only per manufacturer's request?

May we suggest that the DETA IWG considers a process flow to help understanding the UI application / attribution process?

Further comments mainly related to Annex 1 "General guidelines on the use of the UI in case of modifications of approved products or of UN Regulations" could be brought to your attention."

Met vriendelijke groet / Kind regards

Tim Guiting
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