

**CEN/TC 333  
Cycles**



**Document: CEN/TC 333 N. 61  
September 2001**

**Draft Minutes of the 3<sup>rd</sup> CEN/TC 333 “CYCLES” meeting held on 2001-05-18, in Milan (Italy)**

## 1 Opening of the meeting

Mr. Don Wright, Chairman of CEN/TC 333, opened the meeting and welcomed all delegations. Mr. Salerio welcomed the delegates on behalf of the Italian National Standards Body - UNI.

The Chairman thanked the Convenors of the Working Groups of CEN/TC 333 for their work and pointed out the importance of the Round Robin Programme for Comparison of Brake Performance Methods for WG1, WG2 and WG3.

Mr. Wright thanked Mr. Tholin (F) and Mr. Fletcher (UK) for the organisation of the Round Robin Programme, Mr. Wettenberg (S) for drawing his attention to progress problems with the Programme, and Mr. Fletcher for solving those problems. He also thanked Mr. Salerio and Miss. Mocchio for the support given in the activity of CEN/TC 333 and in its WGs in general.

## 2 Roll call

All delegates present at the meeting introduced themselves and signed the attendance list (see Annex A).

Mr. Salerio introduced Miss. Elena MOCCHIO. She works for the International Relations Department of UNI and she is the assistant secretary to CEN/TC 333 CYCLES.

## 3 Adoption of the agenda

The agenda was adopted without any modification, as in document CEN/TC 333 N. 45.

## 4 Appointment of the Resolution Technical Committee

The Secretary asked CEN/TC 333 to appoint the Resolution committee for the drafting of the Resolutions. CEN/TC 333 agreed to prepare the Resolutions only in English and to appoint the Resolution Committee as follows:

- Mr. Fletcher (UK)
- Mr. Legrand (F)
- Mr. Neuberger (D)

together with the Secretary of the TC.

## 5 Distribution of documents of CEN/TC 333 in electronic version: updating of the situation

The Secretary reported that now in CEN lots of Technical Committees use e-mail as instruments for sending/receiving documents. This for different reasons: reduction of the costs of standardisation activity; fast distribution of the documents of the Technical Committees; increment in the efficiency of TC. Therefore, there is the possibility to try out this new method also in CEN/TC 333 (almost all the experts/delegates of CEN/TC 333 have an e-mail address) and this could simplify the distribution of the documents. Mr. Legrand (F) asked if the secretariat can verify if there are problems with the size of e-mail messages (i.e. maximum size of the documents attached to the e-mail message) and if there is the possibility to request a notification for each document sent out. The Secretary answered that for the moment no notification is required but this could be done, if needed.

## 6 Report of activity of Working Group 1 "Bicycles for common use" (CEN/TC 333 N. 46)

Mr. Neuberger (D), Convenor of WG1, reported on the activity carried out by his working group up to now. WG 1 is at a very good stage for Work Item on "Bicycles for common use" because only a few points are under discussion and the frame of the draft standard is already defined. In particular WG1 is working on a robin test programme for the comparison of braking test methods and during next meeting it will be discussed also a proposal for "rim-wear indicators". The draft standard has been harmonised with the document on "Off road bicycles" prepared by CEN/TC333/WG2. Mr. Neuberger stated that during next WG1 meeting, scheduled for June 2001, the draft project on "Bicycles for common use" will probably be finished. Mr. Neuberger reported also that requirements for "trekking bicycles" will be inserted in the document on bicycles for common use, as agreed by CEN members (see document CEN/TC 333 N. 42 Rev.). With reference to the Work Item on "Bicycles for young children", the situation presents some difficulties. For example, ISO 8098 "Safety requirements for bicycles for young children" used as a basis for discussion of the future European standard does not at all satisfy the needs of the European situation and in particular it is not in line with the EC directive on safety of toys. In relation to this, in November 2000 there was a special meeting of a task group and it was pointed that there are different approaches to safety for

this kind of products: some Countries consider bicycles for young children like a “toy”, other Countries use the same approach as for bicycles for common use, by applying the national regulation on traffic and therefore the national standard on bicycles for young children. As a result of the meeting of November 2000, it was defined how to use, with the needed integration, ISO 8098 with the final goal of having a unique standard which would cover bicycles for young children “for private use” (not intended to be ridden on public roads) and “for public use” (intended to be used on the roads). Furthermore, Mr. Neuberger reported that in Germany the authorities want to have a “type approval” for bicycles for young children according to Directive 88/378/EEC. Therefore, the need for a European standard becomes urgent also because it is necessary to clarify the various situations in the different Countries. This activity will be dealt with again during next meeting of WG1.

As regards the Work Item on “Special types of cycles”, Mr. Neuberger reported that WG1 does not have a clear idea on the matter and on which types of cycles WG1 should consider. Also because these cycles do not represent a large part of the market (e.g.: tricycles, monocycles, bicycles for users with special needs etc....). For the time being, this Work Item had not any progress.

Mr. Neuberger proposed to evaluate if BMX cycles can be considered as a special kind of bicycles. He reported that the market for this product is increasing and in Germany and France there are specific standards. In the event that BMX cycles should be considered as special cycles, this Work Item should be developed starting from this basis.

**Action: CEN Members**

**To consider the possibility to develop a standard on BMX as a special types of cycle**

**7 Report of activity of Working Group 2 “Off road bicycles” (CEN/TC 333 N. 47 and 48)**

Mr. Don Wright, Convenor of WG2, reported on the activity on the draft standard relevant to “Off road bicycles”. The Convenor thanked Mr. Jacques Tholin (F) for the initiative to prepare a table for the Round Robin programme for the performance test comparison of brakes (as indicated in document CEN/TC 333 N. 57). This document clearly defines who makes the tests, where the tests are carried out and when, and finally the kind of test performed. All this in order to give to WG2 and the other WGs the results necessary to choose the most suitable test method for the bicycles under study. Mr. Wright reported that Work Item 00333004 is in progress and the draft standard specifies only one grade of bicycles (the high level off road bicycles to be known as a mountain-bicycles).

Due to the fact that last meeting of CEN/TC333/WG2 was immediately before ISO/TC149/SC1/WG4 meeting, the Convenor of WG2 reported that an expert from ISO WG4, Mr. Mark La Plante of Cannondale, U.S.A., was informally invited to attend CEN/WG2 meeting as an observer. The Convenor of WG2 stated that the Americans and Japanese, very active at ISO level, would be happy to follow CEN works. He suggested organising next CEN/TC333/WG2 meeting combined with ISO/TC149/SC1/WG4 as a unique Working Group meeting. Mr. Legrand (F) expressed his concern about this kind of initiative. In particular, Mr Legrand stated that the expert invited to last CEN/WG2 meeting did not formally represent ISO/TC 149 and therefore he recommended, for the future, to define the kind of relationship with ISO/TC 149, by adopting, if necessary, a formal decision. Mr. Legrand explained that CEN/TC 333 should study a European standard on bicycles, since at TC level there is for the moment no agreement to follow the ISO work on the same subject.

Mr. Neuberger (D) pointed out that there are positive and negative aspects in the co-operation with ISO/WG4: a positive aspect could be, of course, the one related to the different technical inputs that would increase the quality level of the standards under study; the negative aspect could be that of been influenced by WG4 on technical solutions which do not at all represent the European reality. Mr. Wright made clear that most of the work developed at CEN level, took advantage from the ISO work and he explained that there was an agreement to invite Mr. La Plante only as an observer to last CEN/WG2 meeting. As a matter of fact, a letter on this subject was sent out and no one expressed his disapproval. Moreover, the only significant difference between CEN and ISO activity is related to the rim- wear indicators. The Secretary of CEN/TC 333 reported that the ISO expert was invited only for that particular meeting and he did not represent ISO but only himself. If, for the future, WG2 should decide to invite someone who is in charge of representing ISO/TC 149, or should decide to have a co-operation with ISO/TC149/SC1/WG4, for example by a joint meeting, this will be officially agreed with CEN/TC 333.

Finally, Mr. Wright thanked the experts of WG2 and Mr. La Plante for the significant technical support given.

**Action: The Convenor of WG2**

### **8 Report of activity of Working Group 3 “Racing bicycles” (CEN/TC 333 N. 49 and N. 50)**

Mr. Petrone, Convenor of WG3, introduced the latest version of Work Item 00333005 “Racing bicycles intended to be used on public roads”. He reported that there are some open topics under discussion related, for example, to carbon fibre components. He stated that the above mentioned draft standard is already in line with the draft document on bicycles for common use and that for off-road bicycles. Mr. Petrone informed the TC that WG3 has a good technical support from the experts and with the use a table of comparison between different existing standard on bicycles (i.e. DIN, AFNOR, UNI, ISO ...) WG3 has clear technical information to be taken as reference. The new edition of draft standard on racing bicycles will be ready for this summer and next meeting of WG3 has been scheduled for November 2001.

Mr. Petrone believed that a complete version of the document could be ready for the end of year 2001.

### **9 Report of activity of Working Group 4 “Accessories” (CEN/TC 333 N. 51 and N. 52)**

The Secretary of CEN/TC 333 introduced document CEN/TC 333 N. 51 on behalf of Mr. Chris Juden (UK), Convenor of WG4, who was unable to attend the meeting of CEN/TC 333. Mr. Salerio presented the requests made by the Convenor of WG4 to CEN/TC 333:

- **Cycle lighting**

WG4 was of the opinion that there is a need to study a European standard on cycle lighting. The main problem is that many Countries have their own national traffic regulation, and therefore the same bicycle would be equipped with different lighting equipment. Anyway this should not be a pretext for inaction.

Mr. Neuberger said that in Germany there is a strict regulation on this subject and the study of a European standard would have little influence on the real situation where this regulation applies. Mr. Boselli (I) said that in Coliped the associates spent lots of time to find an agreement on lighting equipment, but the majority of the EU Countries prefer to apply their own regulations. Mr. Legrand (F) stated that also in France the technical requirements on lighting equipment are inserted into their national traffic regulation. Mr. Pereboom (NL) stated that it would be very strange to have a unique European standard on cycles and not one on their lighting equipment. Mr. Thesslin (S) said that maybe it could be important to find information on the actual situation of each Country on lighting equipment regulation, before starting with the study of an European standard. The Chairman and the secretary suggested to try to collect information on the situation of lighting equipment in EU Countries in order to find a possible common solution.

Mr. Fletcher (UK) suggested that CEN/TC 333 should collate all the European lighting regulation so that the difference could be understood. However, not all CEN/TC 333 members agreed with this solution and therefore it was decided to postpone this item for a future action.

- **Luggage carriers**

WG4 proposed to include in the draft standard on luggage carriers also the luggage carriers used on the front wheel of the bicycle and to adopt ISO 11243 as a basis; WG4 proposed new target dates on Work Item 00333006. This was confirmed by CEN/TC 333 members with resolution N. 18/2001.

Mr. Thesslin (S) referred to corrosion tests as used for luggage carriers of bicycles and asked to CEN/TC 333 to consider if this test could be applied also to all the other parts of the bicycle. Mr. Neuberger (D) said that in WG1 test corrosion is not safety relevant and therefore it is not applied to all the components of the bicycle; this item needs more statistics/information. However, CEN/TC 333 does not consider the corrosion test on bicycles essential from the safety point of view, at least on the basis of the available data.

- **Cycle locks**

The Convenor of WG4 requested the secretariat of CEN/TC 333 to check at CEN level if there is any standard activity that already covers cycle locks. The Secretary answered that there is no specific item in CEN on this kind of product (see clause 12 below).

### **10 Report of activity of Working Group 5 “EPAC” (CEN/TC 333 N 54)**

Mr. Legrand reported to CEN/TC 333 the activity work of WG5. He apologised on behalf of Mr. Saulan, Convenor of WG5 who was unable to attend the meeting. Mr. Legrand stated that WG5 confirmed the scope and the field of application of draft standard W100333009 “Electric power assisted cycles”. The document is linked to the activity of WG1 concerning “Bicycles for common use”; for this reason WG5 proposes to prepare a standard on EPAC making reference to the document on bicycles for common use

already under study in WG1. Mr. Legrand stated that WG5 considers only EPAC with two wheels and the final structure of the standard will be prepared once the document on bicycles for common use is ready for internal enquiry within CEN/TC 333. Mr. Thesslin (S) asked if the definition of EPAC is in line with the definition given in the EC directive; this because the directive indicates a speed limit for this kind of bicycles. It was pointed out that WG5 is preparing a standard containing test methods that could interpret the requirements of the EC directive.

#### **11 Report of activity of Working Group 6 “Terminology” (CEN/TC 333 N 55)**

Mr. Legrand informed CEN/TC 333 that WG6 “Terminology” asked for Mr. G. Jacques to be nominated as the new Convenor of WG6. CEN/TC 333 agreed and took resolution N. 19/2001. WG6 considered lots of terms used in the bicycles field; the opportunity to include in this draft standard languages other than CEN official languages (e.g. Italian and Dutch) was also considered. Mr. Hearn (UK) stated that the addition of languages should not be permitted because CEN/TC333 cannot take responsibilities for languages other than English, French and German and no one in CEN/CS uses languages other than these three languages. The Secretary reported that there are some cases in ISO (with relevant endorsement in CEN) of terminology standards that include many different languages. Moreover the editing committee of CEN/TC 333 could include mother-language experts to evaluate the accuracy of the translation of the terminology draft standard, should the TC decide to use other languages.

Mr. Legrand informed CEN/TC 333 that a first version of WI00333002 “Cycles - Vocabulary - Terminology for bicycles” will be ready for the end of June 2001.

#### **12 Discussion about the need for a new work item on “Cycle locks” (CEN/TC 333 N. 56)**

Mr. Thesslin proposed to study a European standard on cycle locks. He explained that the European position on this subject is different from Country to Country. He proposed a document as base for discussion that includes requirements already adopted by Scandinavian Countries. Therefore, according to the fact that there is no European standard on locks for bicycles, the proposal to open a New Work Item should be considered by CEN/TC 333. Mr. Thesslin proposed to add this new work to the programme of WG4 “Accessories”.

Some of the experts participating to the meeting expressed their concern for a new item like this one. WG4 does not have experts specifically prepared for the study of cycle locks. Mr. Bryan Fletcher (UK) emphasised that a cycle lock is a separate accessory, and it is not a bicycle equipment. CEN/TC 333 confirmed that will not have to be obligatory equipped with cycle locks.

Mrs. Roetynck (B) informed CEN/TC 333 that Belgium has prepared a draft law on cycle locks. After a long discussion on this proposal, the majority of CEN/TC 333 members agreed to consider a study on cycle locks, with two abstentions (UK and NL). CEN/TC 333 took resolution N. 20/2001 and the secretary will circulate a formal progress sheet within CEN/TC 333 members for the study of cycle locks as new work item proposal.

#### **13 Co-ordination between WGs and problems arising; updating of national standards situation on cycles**

##### **13.1 Comparison of braking test methods for cycles (CEN/TC 333 N. 57)**

Mr. Don Wright reported to TC members that the work on the round robin programme is going on; in particular the first test stage has been completed and the second is in progress. The Chairman informed CEN/TC 333 members that for the end of this year some results will be ready for all WGs.

##### **13.2 Rim-wear indicators for cycles (CEN/TC 333 N 58)**

The Chairman introduced document CEN/TC 333 N. 58 about the proposal of a German regulation based on a recently drafted DIN standard requiring for bicycles with light alloy wheel rims greater in diameter than 500 mm to have means of indicating the limit of safe-wear. Mr. Wright asked the Convenor of WG1 to clarify the situation and in particular, to confirm the requirement in Germany for all bicycles to have rim-wear indicators. Mr. Neuberger (D) reported to CEN/TC 333 that there is a big misunderstanding about the interpretation of the rim wear matter.

First of all there was the intention in Germany to publish a new regulation about traffic, in which bicycles were concerned. This draft regulation was put to the attention of the European Commission and EU Countries for enquiry before its publication in Germany. The result was that the Commission requested to German administration not to mention the DIN draft standard in the draft regulation, therefore there was no

reference to any DIN standard in this draft regulation. Mr. Neuberger (D) explained that the draft DIN standard which includes rim-wear indicators, refers only to German regulation for general safety of products. "Rim wear" refers only to city bicycles and trekking bicycles. Mr. Neuberger (D) informed the TC that the proposal for rim-wear indicators was presented a long time ago at DIN level and the application of this requirement on bicycles was suspended until June 2001. The Chairman asked why the problem of rim-wear indicators was not discussed at CEN level and made reference to the exchange of correspondence between himself and Mr. Neuberger (see Annex B herein attached). Mr. Boselli (I) asked if the requirement about rim wear indicator becomes compulsory after June 2001. Mr. Boselli (I) stated that the DIN draft document was a new document and nobody in CEN had been informed on the matter nor was an English version of the document prepared for CEN/TC 333 experts. Mr. Neuberger confirmed that the requirement for rim wear will become effective from June 2001 and he will try to prepare an English version of the DIN document for CEN/TC 333 members.

A big discussion was opened. Some experts expressed their concern on this item; they criticised the policy made by DIN because it creates confusion on the market; some people, in fact, believe that a draft standard of this kind is an effective standard, with the status of a document which represents the state of the art, instead of a working document not yet published and, therefore, not yet valid (nor compulsory). Moreover this approach is completely in contrast, at least in principle, with the European work developed by CEN/TC 333: all the national activity was suspended by all CEN members, apart from this unique case. Mr. Fletcher (UK) noted that the requirement on rim-wear indicators in draft DIN standard is redundant and, from a strictly legal point of view, it would become ineffective as presented in the current DIN document. The Secretary said that this draft standard had not yet been submitted for the enquiry procedure according to the EC directive 94/10. Mr. Neuberger (D) said that this draft comes from a request of the German consumers to make the use of bicycles safer; he explained that there were some accidents and the need to reduce this situation is a clear request of the market. Mr. Legrand (F) asked if there is the real need to have rim-wear indicators on bicycles; he is of the opinion that there is no need to have rim-wear indicators on bicycles; other experts supported this position during the discussion. Mr. Petrone (I) asked CEN/TC 333 to take a resolution about rim-wear indicators in order to clarify the situation. Mr. Legrand (F) proposed to prepare a resolution where it is specified that CEN/TC 333 has not reached a technical solution on rim wear detection up to now and he proposed to WG1, WG2 and WG3 to prepare a report on the need for rim-wear indicators. CEN/TC 333 took resolution N. 21/2001 with the abstention of The Netherlands.

#### **14 Report of the secretariat on programme of work of CEN/TC 333: actual situation, target dates**

The Secretary introduced document CEN/TC 333 N. 59 on the current situation about the program of work of CEN/TC333. He noted that WI00333001 "Bicycles for common use", WI00333004 "Off road bicycles" and WI00333005 "Racing bicycles" should be ready for the internal TC enquiry by the end of year 2001.

#### **15 General information on ISO/TC 149 SC1**

The Chairman of CEN/TC 333 reported the situation of ISO/TC 149. ISO WG4 is now preparing a last version of the draft standard on mountain bikes, which, from a practical point of view, is identical to CEN WG2 draft document on off road bicycles. ISO/DIS 8098 on bicycles for young children has been discussed during a special meeting organised in order to evaluate the comments received during the ISO enquiry. This would permit to have a new version of the draft project that could satisfy those Countries who voted against it. Mr. Wright believes that ISO/DIS 8098 would become an ISO standard by the end of 2001.

#### **16 Any other business; date and place of next meeting**

Mr. Thesslin asked to circulate a list of experts registered in each WGs of CEN/TC 333.

Mr. Neuberger asked CEN/TC 333 to consider a new work item for trailers for bicycles, as in Germany there is a draft regulation under study.

CEN/TC 333 agrees to have next meeting on 12<sup>th</sup> and 13<sup>th</sup> December 2001 in Italy.

#### **17 Adoption of the resolutions**

The Resolutions were adopted as written in CEN/TC 333 N. 60.

- **Annex A:** Attendance List

- **Annex B:** Correspondence between Mr. Wright and Mr. Neuberger on rim wear indicators.



# ANNEX A

## Assignment of Exploitation Rights

Including the List of Participants

Date(s) of meeting 18<sup>th</sup> May, 2001

Place of meeting MILAN

\* CEN/TC 333 Title CYCLES

Secretary: (name) Gian Luca Salerio

NSO UNI - Italy

\* CEN/TC...../SC..... Title .....

Secretary: (name) ..... NSO .....

\* CEN/TC...../WG..... Title .....

Convenor: (name) ..... Country .....

\* Other structure CEN..... Title .....

Secretariat : (name) ..... Country .....

(\* Only complete that part which is appropriate)

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#### List of assignees

Name	Initials	Signature	Date	Representing	Country





## ANNEX B

Herrn. Dipl. -Ing. Siegfried Neuberger  
Zweirad-Industrie-Verband  
(ZIV)  
Pfungstbrunnenstr. 62  
65824 Schwalbach  
Germany

7th May, 2001

Our Ref. DHW/ME/208

Dear Siegfried,

### RIM-WEAR INDICATORS

I am writing in my official capacity as Chairman of CEN/TC333.

#### 1. THE GERMAN REGULATION

You recently brought to my notice that with effect from June, 2001, a regulation will be legally enforced in Germany requiring all "cycles for common use" (i.e., "city bicycles") to have some means of indicating the safe limit of wear on rims which form part of the braking system. This regulation will refer to DIN 79100 : 2000-4 which "specifies safety requirements for bicycles intended for use on public roads" (for a more exact translation see below. Therefore, it cannot strictly apply to all other types of bicycle (i.e. off-road or racing bicycles) but it could well be considered to apply to trekking bicycles (hybrids), and in a court of law a judge could well rule that this the state of the art irrespective of the type of bicycle.

Whilst I understand that the European Commission was notified about a proposed German law on bicycles on 15th March, 2000, I also understand that reference was made to a newly revised version of DIN 79100-2. It is reference to this later document that is a problem because it must have been known that CEN/TC333 was actively working on an equivalent European standard at that time, the first meeting of CEN/TC333/WG1 having taken place on 28th and 29th June, 1999, under a German Chairman and a German secretary!

In CEN there is a requirement that national standards of this type should not be introduced when the subject is under active discussion by a CEN Technical Committee because a standstill agreement by members of CEN/CENELEC applies.

#### 2. TRANSLATION INTO ENGLISH FROM DIN 79100 : 2000-4

Page 2 Extract

##### **Areas of Use**

This standard is valid for two-wheeled cycles which are covered by the road-traffic licensing regulations (StVZO) and may therefore be used in public traffic.

Page 28 Extract

**4.10.2** Every aluminium rim with a rim diameter greater than 500 mm which represents part of a braking-system must be made in such a way that any wear of the rim caused by braking is recognisable without removal of the tyre.

NOTE: The technical solutions for this are presently being developed. The appropriate requirements will become described in CEN/TC333 "Cycles" to be discussed under European Standards.

### 3. THE HISTORY OF THE RIM-WEAR SUBJECT

I appreciate from your comments at our recent CEN/WG2 meeting that you, personally, have tried to delay the action in Germany to allow CEN to discuss the matter. Also, it is quite correct that you did mention rim-wear problems in ISO/TC149/SC1/WG5 (Document ISO/WG5 N2-55), and we decided at the time that rims were a specialist subject, so as agreed, I did write to Mr. Bertino of CUNA (the secretary of the ISO committee for rims) on 23rd July, 1998, but I did not receive any reply. Possibly I should have followed this up but, eventually, WG5 agreed to await the results of a meeting in Germany (Document ISO/WG5 N2-73). I am not aware of any follow-up report from Germany.

In Document ISO/WG5 N2-83, an agreement on wording appeared, and this was incorporated in the ISO draft off-road standard. This wording was sent to Mr. Lorentzen for consideration by CEN/TC333/WG1 (but *not* by DIN), and it appeared as Document CEN/TC333/WG1 N 14r dated 25th October, 1999.

I can find no reference to any discussion on this subject in either my personal notes for the second meeting of CEN/WG1 or in the Minutes (Document CEN/TC333/WG1 N22). The same applies to the third meeting (N31), the fourth meeting (N42), the fifth meeting (N56), the sixth meeting (N63), and I submitted a further document containing modifications of ISO proposed text on rim-wear indicators for possible discussion at the seventh meeting (N73) but *again* the subject was not discussed.

### 4. THE RIGHTS AND WRONGS OF THE GERMAN ACTIONS

It is widely accepted that there is a problem with rim failures due to brake-wear but there is a serious lack of statistics on the number and types of any accidents which have been caused by such failures. Other European manufacturers are aware of the problem and are trying to devise practical solutions to it, but at the present time those practical solutions have not been devised universally.

Also, there are concerns that modifications to rims to indicate wear may, in themselves introduce weaknesses which may lead to failures under impact or fatigue loading, particularly when the rim is worn, thereby causing the very type of failure they are intended to prevent. So, there needs to be a development phase before regulations are introduced and, possibly, some form of testing should be required on new and worn rims.

Based on the foregoing, it is surprisingly contrary to the spirit of European cooperation for DIN to suddenly make rim-wear indicators a legal requirement in Germany. As you are deeply involved in the study of future European standards on bicycles, you should therefore support TC 333 and focus as much of the work as possible at a European level, avoiding any national initiatives. I can only state that it appears absolutely premature for DIN and the German authorities to introduce such a regulation before CEN has discussed and agreed on the appropriate action, particularly when documents have been submitted to WG1 for discussion.

## 5. A SIGNIFICANT WEAKNESS IN THE ORIGINAL GERMAN REQUIREMENTS

From my translation of the original DIN standard I found a significant weakness.

If my translation on page 1 of this letter is accurate, then the regulation is meaningless because the requirement is that "any wear of the rim caused by braking is recognisable without removal of the tyre". Since there is no reference to "a safe limit of wear", it is reasonable to conclude that rims at present do exhibit wear due to braking with the tyre in place. Therefore, in my opinion, the wording of the associated regulation is very weak in legal terms and could well be ineffective.

However, I now understand that there have been more detailed requirements in DIN 79100-2/A1 but I have not had access to this document and I would be grateful if you could send me by fax a copy of the appropriate page(s) before our TC333 meeting.

I await your reply with interest.

Yours sincerely,

Don H. Wright

cc. Herrn. Dipl.-Holzw. Holger Lorentzen - DIN, Köln

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To: Mr. Don H. Wright

Company: Chairman of  
CEN / TC 333

Date: 14.5.2001

Fax 0044 - 1 - 202476771

Total pages incl. this side: 2

Please inform us if you haven't received this fax completely.

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**Rim-Wear-Indicators**

Dear Don,

Many thanks for your letter dated May 10, 2001. Hereafter I send you the following informations:

1. German regulation

In the scope of the notification-procedure in Europe each reference to the DIN 79100 was cancelled in the draft of this regulation. Priorities are the requirements for the lighting equipments on bicycles and bicycle trailers. So the direct reference of the legislation to the DIN 79100 and correspondingly to the rim-wear-indicators is no more given.

As you have reported correctly, the area of applicability of the DIN 79100 refers to the "two wheeled cycles which are covered by the road-traffic licensing regulations (StVZO) and may therefore be used in public traffic". So the City- and Trekking-bicycles with lighting equipment are included in this scope.

Because the requirements for a "rim wear indicator" were just included without technical description in an earlier edition of the standard (edition October 1998), the standstill agreement has not been broken.

2. Translation into English from DIN 79100\_4 / 2000

We want to propose this formulation for die CEN-standardization.

### 3. The history of the rim-wear-subject

Up to now we haven't submitted an official proposal to the WG 1, because in this WG the requirements for rims haven't been discussed until now. They will be discussed the first time in the next meeting on June 5 / 6, 2001, in Köln.

### 4. The rights and wrongs of German actions

The discussion concerning the requirements for the stability of bicycle components is basing in the less of all cases on statistic values of accidents. In Germany some cases occurred in which the worn out rims were causal for an accident. These accidents were the cause for the discussion which led, among the participation of the bicycle- and rim-industry, to the decision to include also the requirement for "rim-wear-indicators" in the DIN 79100. Just after 2000 - 3000 km the rims are partly so worn out that tears in the rims occur, which may burst then. Moreover there are just many rims on the market, which show such control equipments: for example Alesa and Kettler. So the product liability risk for rim-producers, who don't have such control equipments is much more increasing.

I must point out once again that the DIN 79100 is not included in the StVZO (Straßenverkehrszulassungsordnung). So it is no law, but a standard which was worked out among participation of all involved circles in Germany.

### 5. A significant weakness in the original German requirements

The DIN 79100-2 / A 1 was only a draft, which was worked in to the DIN 79100 (4/2000). This draft is no more valid. We (that means the industry, the test institutes and the consumer associations) think that with this general formulation in the DIN 79100 (4/2000) in the legal sence a sufficient requirement was found which allows different technical solutions.

In the manual there must be a description for the use of the rim and also what the user has to do when the sign of wear limit is reached.

Best regards

Zweirad-Industrie-Verband e. V.

  
Siegfried Neubeger