(133rd WP.29, 22-25 June 2004, Agenda item 4.2.9)

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## Comments in regards to: - Proposal for Draft 02 Series of Amendments to Regulations No. 79 (document TRANS/WP.29/2004/42)

Transmitted by the Russian Federation

The Russian Federation supports adoption of the 02 Series of Amendments to Regulations No. 79 as they are presented in the document TRANS/WP.29/2004/42.

Those amendments introduce changes and additions to the Regulations No. 79 connected to appearance of electronic devices in the steering systems. There is no doubt that such devices shall not deteriorate vehicle safety performance. The related provision is stipulated by the paragraph 5.6.1 of the said document. However, by virtue of insufficient study, the document does not include any procedures of checks, which would allow confirming compliance with the said provision.

To the opinion of the Russian Federation, the procedure of such checking is actually comes to finding-out, how dynamic stability of a vehicle, which steering system is got equipped by an electronic system with certain properties, is improved/deteriorated.

At several past GRRF sessions, the Expert from the Russian Federation presented the relevant method of checking of safety of introduction of electronic steering control at the emergencydriving situation. It was described, in particular, in the informal document No 20 of the 55<sup>th</sup> GRRF session. In the said method vehicle dynamics is caused by the restricted trajectory to be followed, so the emergency road situation is simulated, which makes the test close to the actual driving conditions. The said method was many times confirmed by the vehicle tests performed at the Russian testing center in Dmitrov.

The similar method is applied in Russia for checking safety of commercial vehicles including those designated for carrying dangerous goods, which allowed to make a proposal of incusion of such method into the Regulations No. 111.

The consideration of the said method is kept postponed by GRRF (see TRANS/WP.29/GRRF/55, para. 25), owing to complication of work for preparation of the 02 Series of Amendments to Regulations No. 79, and in expectation, that the appropriate proposals on the said subject will be submitted by ISO.

The Russian Federation proposes to WP.29 to continue by GRRF the consideration of the dynamic test method for evaluation of vehicle handling and stability in order to include it into the regulations Nos. 79 and 111