

**CLEPA comments on ECE/TRANS/WP29/GRPE/2006/8
WWH-OBD, Generic Module B**

A. PROPOSAL

•Paragraph 3 - Definitions

Add:

3.9 Access

“Access” means the availability of all system-related OBD data including all fault codes required for the inspection, diagnosis, servicing or repair of all system-related parts of the vehicle, via the serial interface for the standard diagnostic connection.

3.10 Unrestricted

“Unrestricted” means

- access not dependent on an access code obtainable only from the manufacturer, or a similar device, or
- access allowing evaluation of the data produced without the need for any unique decoding information, unless that information itself is standardised.

3.11 Standardised

“Standardised” means that the diagnostic connection and all data stream information, including all fault codes used, shall be produced only in accordance with industry standards which, by virtue of the fact that their format and their permitted options are clearly defined, provide for a maximum level of harmonisation in the motor vehicle industry.

3.12 Repair Information

“Repair Information” means all information (including all subsequent amendments and supplements) required for diagnosis, servicing, inspection, periodic monitoring, repair reprogramming or re-initialisation of the vehicle and which the manufacturers provide for their authorised dealers/repair shops. Such information shall include an unequivocal vehicle identification and build detail, service hand-books, technical manuals, training material, component and diagnosis information (e.g. minimum and maximum theoretical values for measurements), wiring diagrams, diagnostic trouble codes (including manufacturer specific codes), the software calibration identification number applicable to a vehicle type, information provided concerning and delivered by means of proprietary tools and equipment, data record information and two-directional monitoring and test data.

3.12 Independent operator

“Independent operator” means undertakings other than authorised dealers and repair shops which are directly or indirectly involved in the repair and maintenance of motor vehicles, in particular repairers, manufacturers of repair equipment or tools or components, distributors of spare parts, publishers of technical information, automobile clubs, road assistance operators, operators offering inspection and testing services and operators offering training for repairers.

•Paragraph 4 – General Requirements

Paragraph 4.4.1 - Access to diagnostic information

Add new sub-paragraph after the second subparagraph.

“Access to the OBD system required for inspection, diagnosis, servicing or repair of vehicle must be unrestricted and standardised. All fault codes must be consistent with those defined in the relevant modules C.”

Add new paragraphs 4.6 and 4.7 to read:

“4.6 Access to vehicle repair information

Manufacturers shall make available to independent operators access to any technical information, diagnostic and special tools and equipment, including any relevant software, or training material required for the diagnosis, servicing, activating, inspection, periodic monitoring and repair of vehicles. The information shall be made available via the vehicle manufacturer’s web site in a readily accessible, prompt and non-discriminatory way and in a practically usable form.

4.7 Information for component and diagnostic & special tool manufacturers

To ensure that the development of replacement components which are critical to the correct functioning of the OBD system as well as the development of generic diagnostic and special tools and equipment are not restricted by the unavailability of OBD-related information, the manufacturer shall make available the general and typical operating parameters of the OBD system as well as a description of the system’s component monitoring strategy. This OBD related information will be made available on a non-discriminatory basis to any interested component, diagnostic tools or test equipment manufacturer. “

•Paragraph 8-Documentation requirement

Add at the end of first indent of the third sub-paragraph:

- “.....retained by the authority. This package shall contains, as specified in the relevant modules C, the information to enable manufacturers of replacement or retrofit components to make the parts they manufacture compatible with the vehicle OBD system with a view to fault-free operation assuring the vehicle user against malfunctions. Similarly, such relevant information shall enable the manufacturers of diagnostic tools and test equipment to make tools and equipment that provide for effective and accurate diagnosis of the relevant vehicle systems.”

B. JUSTIFICATION

CLEPA proposals are:

- to provide for the unrestricted and standardized access to technical information for independent operators.
- To make sure that the development of OBD-compatible replacement components, which are critical to the correct functioning of an OBD system, is not restricted due to the unavailability of pertinent OBD-related information.

These specific provisions are needed to maintain effective competition in the automotive aftermarket and thereby free consumer choice and affordable mobility, to ensure functionality and environmental and safety compliance throughout the life of the vehicle and to reduce the cost burden of environmental and safety legislation through free competition in the supply of aftermarket care. For access to repair information, the principle should be in the Generic Module B, and the implementation should be left to Contracting Parties when transposing the GTR in their legislation, due to different systems already in place.

For the technical information needed to design and manufacture OBD-compatible replacement parts, diagnostic tools and test equipments, the information itself should be part of the documentation requirements. Details on implementation should be left to Contracting Parties when transposing the GTR in their legislation, due to different systems already in place.

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