## **US comments on the Draft GTR**

Paragraph/figure/table	Recommendation	Comment/Justification
Telltale visibility requirement for driver warning	Keep the telltale's visibility requirement in part B	As agreed at the 6 <sup>th</sup> meeting in Budapest, This provision prescribes the visibility requirements of the warning telltale. It was also agreed that the specific design of the telltale icon is left for the manufacturers' discretion.
		This provision simply requires the telltale to be visible and in front of the driver. It also prescribes the required colors in the events of (1) fuel leakage and (2) failure of the detection system.
		The warning informs the driver of potential fire and/or explosion events. This is no different than any of other safety related telltales as described in the previous GTRs and regulations.
Section 5.2.1.2 Single failure of hydrogen fuel system	Recommend the following changes:  5.2.1.2.3 If a single failure ( <b>remove</b> -downstream of the main hydrogen shut off valve) of the fuel system results in a hydrogen concentration in air greater than 4% by volume within enclosed or semi enclosed volumes on the vehicle, the main hydrogen shutoff valve shall close (original OICA proposal) and a warning to the driver shall be provided.	Include a provision for leakage of the fuel system down stream as well as up-stream of the PR to include high pressure components such fuel container and fittings.
		Currently, there is no provision in the event of leakage of the high pressure components.

Section 5.2.2 Post Crash	Additional post crash provision for leakage:  The hydrogen fuel leakage shall not be vented into the enclosed and semi-enclosed spaces in the vehicle.	The current requirement for post-crash does not provide safety if the leakage was vented inside of the vehicle
Open issues in section 5.2 vehicle fuel system	For overpressure protection, move this provision to part A.	Please see attached justifications.
Open issues in section 5.2 vehicle fuel system	Provision for air tightness of the fuel system: Again, if this is a requirement for type approval, it's recommended to move this provision to part A.	The US feels this is a production quality assurance requirement. This is difficult for compliance test without additional benefit.