

Observations to the proposal from the European Union (informal document WP.29-155-06) with regard ECE/TRANS/WP.29/2011/94 (Supplement 9 to the 11 Series of amendments to Regulation No. 13)

The amendments contained in the informal document WP.29-155-06 are identified as “clarifications”. In the opinion of CLEPA the proposed amendments are not clarifications, in terms of improving understanding, but are changes to the fundamental philosophy behind the Supplement 9 proposal.

The objective of the Supplement 9 proposal is to provide an alternative method by which a motor vehicle manufacturer can demonstrate conformity to the requirements of Annex 21 (vehicle stability function) in obtaining vehicle type-approval to UN Regulation No. 13.

The proposed alternative method would allow a vehicle stability function system manufacturer to provide a motor vehicle manufacturer with a Technical Service generated test report, in accordance with the requirements of Annex 19 Part 2, which could then be utilised by the motor vehicle manufacturer in the vehicle type-approval if the vehicle manufacturer wanted to do so.

There is no compulsion on the vehicle manufacturer to use the test report. Also, the Technical Service carrying out the vehicle type-approval can refuse to accept the test report if it is not applicable to the vehicle(s) for which type-approval is being requested, or if it is considered that the technical content does not conform to the requirements of Annex 19 Part 2.

The advantage of this method is that a substantial amount of the work required by each motor vehicle manufacturer at the time of vehicle type-approval can be “pre-assembled” by the system manufacturer prior to type-approval. This is especially beneficial for low volume motor vehicle manufacturers as individual costs are reduced through the use of a common method and the system manufacturer carries the initial costs.

The testing in generating the test report would cover testing on both low coefficient of adhesion surfaces (e.g. winter testing in Sweden or Finland) and high coefficient of adhesion surfaces (e.g. summer testing in France or Germany) and involve a large number of different vehicles (e.g. trucks, tractors for semi-trailers and buses, with 2 and 3 axles, various driveline and ABS configurations) on both occasions. Therefore, the costs involved in generating a test report are very substantial and only large substantial organisations are able to carry such costs.

As a result, by replacing “system manufacturer” by “vehicle manufacturer”, especially with regard to paragraphs 1.1.3.1. and 1.1.4.1. of Annex 19 Part 2, only the vehicle manufacturer can initiate a test report with a Technical Service. Therefore, as each low volume motor vehicle manufacturer cannot bear the costs of a test report and a system manufacturer cannot carry the cost of a test report for each low volume motor vehicle manufacturer, the proposal from the European Union is only favourable to large motor vehicle manufacturers.
