

Comments on ECE/TRANS/WP.29/GRSG/2012/24 (Proposal for amendments to Regulation No. 67 by the European Association of Automotive Suppliers)

The modifications to the text of ECE/TRANS/WP.29/GRSG/2012/24 are marked in blue characters.

I. Proposal

Part II, insert new paragraph 17.1.2.1., to read:

"17.1.2.1 Notwithstanding the provisions of paragraph 17.1.2., if the ~~CNG-LPG demand control is integrated in the engine~~ electronic control unit ~~and~~ is type approved in a vehicle installation during vehicle type approval according to ECE-R67 part II and ECE-R10, no separate type approval of the ECU in accordance with ECE-R67 part I is required necessary. ECE-R10 requirements and tests shall be complied with on both fuels. The vehicle type approval shall be pursuant to the applicable provisions laid down in annex 14 to the present regulation."

Part II, insert new paragraph 17.6.1.3., to read:

"17.6.1.3. The remotely controlled service valve ~~shall~~ may stay in an open position during the commanded stop phase of an automatic stop-start system for a maximum time of 100 seconds."

Part II, insert new paragraph 17.9.5., to read:

"17.9.5. The remotely controlled shut-off valve may stay in an open position during the commanded stop phase of an automatic stop-start system for a maximum time of 100 seconds."

Part II, paragraph 17.11.5., amend to read:

"17.11.5. Vehicles with more than one fuel system shall have a fuel selection system." ~~which prevents both a flow of gaseous fuel into the petrol tank and a flow of petrol into the gaseous fuel tank also in case of a single fault. The measure shall be demonstrated during the type approval.~~

Annex 14, paragraph 2., amend to read:

"2. The switching off delay of the service cut-off valves after stalling of the engine may not be more than 5 seconds. This delay may be extended up to but not more than 100 seconds during the commanded stop phase of an automatic stop-start system."

Annex 14, insert new paragraph 2.1., to read:

~~"2.1. The remotely controlled service valve shall stay in an open position during the commanded stop phase of an automatic stop-start system for a maximum time of 100 seconds."~~

II. Justification

Reference, paragraph 17.1.2.1.

AEGPL agrees with the principle of the proposal. Nevertheless, it should be made clear that R.10 should apply to both running mode, petrol and LPG, since the activation of different wiring and sensors may affect the EMC tests: integration of the two ECU's is not sufficient to avoid R.10 tests on petrol. Having to test, anyhow, the electromagnetic compatibility in both running mode, an extension of the provision to all the cases, including the ones in which ECU's are separated is proposed.

Reference, paragraphs 17.6.1.3. and 17.9.5.

AEGPL proposes to change "shall" with "may" as that strategy could be not required in certain applications. An equivalent provision to that proposed for the remotely controlled service valve (para. 17.6.3.1) should apply also to the remotely controlled shut-off valve (para. 17.9.5).

Reference, paragraph 17.11.5.

There is no risk of reverse flows since the two fuels are injected under positive pressure by means of timed valves.

Reference, Annex 14.

The part under review is related to gas ECU. Therefore the new provision should refer to switching off management (under the control of the ECU) rather than to the remotely controlled service valve. As regards the use of "may" instead of "shall" see justification above.