

Informal documernt WP.29-164-31 (164th session of WP.29, agenda item 8.5)

AECS: draft UN Regulation

Industry observations based on the current developments at the informal group

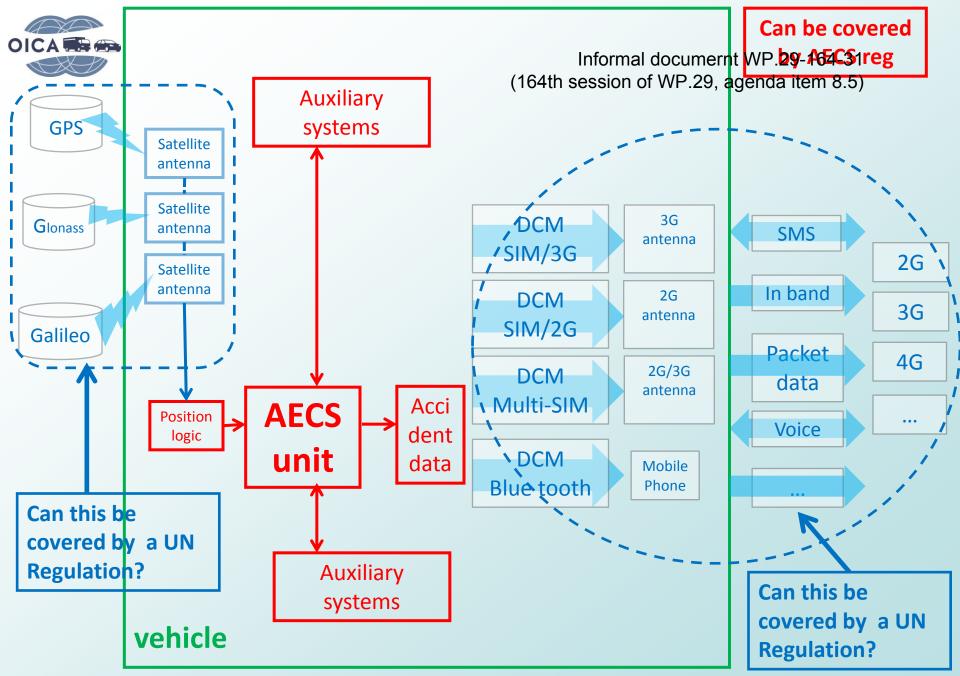
Update for WP29 of Nov. 2014 (follow-up of document WP29-163-12)



Reminder of the Industry Objectives 31

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- Drive overall harmonisation and <u>mutual</u> recognition of vehicle system approvals
- Define manageable international and <u>performance</u> <u>based</u> type approval requirements
- Find a solution to the problem of the scope of this future UN Regulation:
 - → 58 Agreement addresses <u>vehicle systems only</u>,
 → AECS is a <u>multi-stakeholder</u> issue, including out-of-vehicle infrastructure systems!





- OICA fully committed to a new UN R on AECS
- OICA strongly insists that any new UN Regulation remains consistent with '58 Agreement principles of mutual recognition
- Connectivity networks (e.g. mobile phone and satellite positioning) outside the field of influence of WP29
- Need for WP29 guidance to the GRSG-AECS informal group on the way forward



- > High frequency in changes to mobile phone networks:
 - Can a CP still accept a vehicle approval originally granted on the basis of outdated network?
 - Can WP29 continuously adapt the future AECS regulation to the networks evolutions?
 - Mobile phone networks lifetimes quite shorter than those of the automotive Industry
 - Mobile Network Upgrades overlap during phase-in periods
- OEM's specifications will anyway have to follow the regional market evolution for connectivity networks no need to regulate this aspect under the '58 Agreement.



The approach of Classes, WP.29-164-31

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GRSG Informal Group considering possibility to introduce different Classes (Classes I, II, III) for each regional mobile network and regional data transmission format.

This would supposedly allow addressing all issues in one UN R, but:

- Will prevent mutual recognition of UN approval: Approval to Class I not accepted in CP requiring Class II or III
- Would be similar to having 3 different UN Regulations, each dealing with one class!
- Will not solve issue of evolving networks
- May result in additional Classes for other CPs in future (additional fragmentation!!!!)



Conclusion

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OICA's preferred solution: Scope in line with the 58 Agreement

- Technical AECS requirements limited to the "red components" on-board the vehicle (see slide 3)
- $\checkmark\,$ Region-specific provisions excluded from the AECS Regulation

harmonisation and mutual recognition for "red components"
 "blue components" remain in national/regional framework

OICA believes this is the most appropriate solution under '58 Agreement:

- ✓ Respects the '58 Agreement principles : MUTUAL RECOGNITION OF APPROVALS
- Not depending on requirements and standards that are not in the field of WP29



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Thank you for your attention