

DRAFT REPORT OF THE 44th SESSION OF THE IWG ON DETA

Date: Thursday 9 June 2022
Venue: abbreviated virtual meeting
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Secretariat: Tim Guiting, RDW, The Netherlands (tguiting@rdw.nl)

Agenda

1. Adoption of the provisional agenda.
2. Approval of the draft minutes of the IWG on DETA 43rd session.
3. State of play.
4. Widening of the scope of DETA.
5. Report on the Task Force on UI session.
6. Proposal for a Q&A on UI.
7. Presentation on UI to WP.29 subsidiary bodies on UI.
8. Amending 'UI guidelines document' ECE/TRANS/WP.29/2022/62.
9. Report to WP.29.
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1. Adoption of the provisional agenda.

Document DETA-44-01e. The Chair suggested discussing the second AOB point on 'access rights in the course of PTI' together with agenda item 4 on widening the scope of DETA. The agenda was amended accordingly and adopted.

2. Approval of the draft minutes of the IWG on DETA 43rd session.

Document DETA-44-02e. The draft minutes were approved.

3. State of play.

The Chair laid out the current state of play, noting that fifteen authorities uploaded in total 22,600 approvals and thirty-four contracting parties notified a focal point to access the system. About 5,600 manufacturers are uploaded and thirteen manufacturers have access to their own approvals in DETA. He underlined that the DETA system is working well and stable and the administrator has not received any complaints from users.

The Chair then updated the IWG on the technical developments as regards:

- mass upload-functionality: the implementation is delayed. The functionality is installed in a test system at the German KBA. Other authorities could test this functionality from August;
- two-factor authentication: KBA will contact the software house about an offer latest in July;
- UI (Unique Identifier): the UI is not fully defined yet as the IWG is still working on the Q&A and guidelines. KBA is waiting for the offer from the software house.

The expert from the software house confirmed that the mass upload-functionality was installed in March and added that the two-factor authentication still must be tested. She also pointed to the specifications for the UI, which are not yet defined.

The expert from OICA referred to the discussions on UN Regulations that may prohibit the UI marking and discussions on shifting additional markings to the summary documents and that, when this is broadly applied, the UI concept will make no sense anymore. He also noted that WP.29 must confirm the UI concept before the contract can be settled.

In answer to questions from the expert from OICA, the Chair explained that the development on 'summary documents' was included in the offer but not the web service for the public access to them. He confirmed that it is important to get clarity about the UI concept before the development can start.

The expert from OICA then pointed to the money reserved by the sponsors for the UI development and explained that the funds cannot stay available for a long period. Therefore, the contract must be received soon. The Chair suggested forwarding a statement on the time pressure to the WP.29 subsidiary bodies.

The UNECE secretariat added that no new information was available on the financing or hosting of DETA at UNECE.

As regards the mass upload-functionality, the Secretary inquired about the differences with the functionality installed at the equivalent European system ETAES. The Chair confirmed the functionality is the same, except for some attributes and the URL. The expert from the software house added that once the involved authorities confirm that the functionality works well, it could go into production. She also offered to provide guidance for the authorities joining the test phase. It is necessary that the (larger) authorities participate.

The Chair then informed the IWG that he updated WP.29 in March on the work of the IWG on DETA. WP.29 requested the IWG providing assurance that the confidentiality would be warranted so that access to DETA to PTI stakeholders could be granted. WP.29 furthermore invited GRVA to resume discussions on cyber security in relation to DETA and to advise the IWG on DETA.

Lastly, the Chair explained that WP.29 will consider the proposal for amending the 'specifications and application guideline for the Unique Identifier (UI) module' at its June session.

4. Widening of the scope of DETA.

The Chair recalled the discussions on broadening of the scope to make DETA more attractive to also the CPs to the 1998 and 1997 Agreements. He informed the group on two developments. First concerned the request from China to share information on Cyber Security (CS) with the 1998 Agreement CPs. The UNECE secretariat explained that China provided more information to GRVA and GRVA would organise a workshop on this issue including 1998 Agreement CPs. The workshop may be held before September and the IWG on DETA could wait for the results. The Chair continued with the second development related to the access to DETA to PTI stakeholders. If, according to the Chair, access is limited to summary documents the confidentiality is warranted but in case PTI stakeholders also need access to certificates and test reports this needs to be considered. The expert from OICA stated that access to certificates would be acceptable but that it would be more critical when access to information documents and test reports is requested. A justification would be necessary. The expert from ETRTO confirmed that the read access to summary documents would be OK. He further explained that ETRTO did not understand the need for PTI stakeholders to access certificates. The Chair emphasized that certificates may be helpful to confirm markings.

The Secretary pointed to the recent discussions within the 'Task Force on UI' session to advise the WP.29 subsidiary bodies that for UN Regulations where no additional marking information is required, no summary documents would need to be developed. But for those cases, a minimum set of data like approval number, series of amendments and, potentially, issuing date, could be retrieved from the attributes available by the web service.

The group concluded that it would be necessary that CITA confirms exactly what kind of information is required for PTI stakeholders and to provide justifications.

The UNECE secretariat referred to ECE/TRANS/WP.29/1164, para. 76, clarifying the request from WP.29 to warrant the confidentiality for PTI stakeholders. To this end, it would be necessary to identify exactly the use cases, so who should get access for what purpose, and then address the confidentiality issues. Also, access to market surveillance authorities should be included. The tools for public access should address the needs for all stakeholders. According to the Chair, it should then be considered to add more information to the summary documents or attributes for these stakeholders.

The Chair concluded that more discussion is necessary, in particular with CITA. A definite answer to WP.29's request will be prepared for the November session of WP.29.

5. Report on the Task Force on UI session

The Secretary introduced the report of the Task Force on UI session from 17-18 May, document DETA-44-05e. He summarized:

- the session was attended by the IWG on DETA Chair and Secretary and experts from CLEPA, CITA and the software house and by the 'GRPE ambassador';
- the draft Q&A on UI was discussed and amended, document DETA-44-04e rev1;
- the expert from CITA raised serious concerns about the UI markings in case these would also replace current markings necessary to identify functions or installation of the product. In case this information is not visible on the product and must instead be retrieved from a web service, this would lead to additional burden during PTI inspections. The Task Force argued that CITA should bring this to WP.29;
- the Task Force identified various omissions in the UI guidelines document and suggested to review the entire document again;
- the Task Force discussed the complexity when products, like e.g. lamp assemblies, combine multiple components, and will need a combined UI number. Especially in case a UI of a component as part of the assembly changes, the combined UI number might need to be changed as well. Also, there are many

different combinations possible. The Task Force agreed that it is essential that correct UI markings are applied;

- the Task Force suggested to advise WP.29s subsidiary bodies that for UN Regulations where no additional marking information is required, no summary documents need to be developed as for those cases, a minimum set of data like approval number, series of amendments and, potentially, issuing date, could already be retrieved from the attributes to be accessed by the web service.

The expert from OICA acting as GRPE ambassador mentioned that GRPE discussed the UI and GRPE's understanding of the issue is gradually growing. There might be a level of caution, in particular due to the unknown consequences for the light duty, heavy duty, non-road and motorcycle regulations as well as for retrofitting.

The Secretary explained to correct draft report DETA-44-05e as regards the reference to the attendees and suggested to request approval of the report during next session.

6. Proposal for a Q&A on UI

The Secretary briefly introduced the amended draft Q&A on UI, document DETA-44-04e rev1, and highlighted:

- a version with track changes detailing all proposed amendments and justifications was uploaded;
- an 'introduction' explaining the background of the UI and purpose of the Q&A was included;
- many editorial amendments were included;
- main point for discussion now is the potential deletion of Q6 explaining the benefits of the UI. The Task Force argued that the Q&A is primarily intended for WP.29s subsidiary bodies and national authorities and not for promotional purposes.

The Secretary also pointed to written comments by OICA on Q3 requesting the following amendment:

"The layout is defined in Schedule 5 of the 1958 Agreement and may be repeated in UN Regulations which explicitly foresee that do not specifically prohibit a UI marking as an alternative to the known UN marking". The reason according to OICA is that, based on Schedule 5 of the revised 1958 Agreement, by default all UN Regulations allow the use of the UI marking unless those regulations specifically prohibit this. The Secretary agreed to this reasoning and suggested to endorse the amendment accordingly.

The UNECE secretariat however pointed to discussions at GRVA suggesting a careful approach supporting a uniform application.

The expert from OICA acting as GRPE ambassador explained that also in GRPE similar views had been shared and that it is necessary to understand what needs to be included in the regulations. To prevent problems it may need to be decided to first temporarily prohibit the use of the UI marking in the regulations and later remove the ban once the UI is well known and established and it becomes clear what needs to be included in the regulations.

The expert from ETRTO believed the UI marking could not be applied by default unless the UI model is included in the associated UN Regulation.

The UNECE secretariat explained that the 1958 Agreement provides the framework but that it did not provide technical details regarding the implementation and use of UI markings. Legal experts will not sort this out as the matter is related to practicalities. The issue must be discussed within this group. He furthermore pointed to document GRVA-12-28 dealing with GRVA's assessment of UN Regulations under the purview of GRVA concerning the UI and proposing a step approach including a temporarily ban for some regulations, as an interim phase.

The representative of Finland explained the discussions at GRSP and that GRSP would consider the UN Regulations and what needs to be done for each regulation, especially those that could benefit from the UI or in contrast for which the marking should be prohibited. For those regulations for which the UI is having no benefit and its marking expected seldom being used, it was suggested to have no summary documents developed, as this would create an unnecessary burden.

The Chair concluded that this issue on "by default" would be addressed to WP.29 and included in the status report to be presented at the June session.

As regards the potential deletion of Q6, the expert from OICA explained that he laid the foundation for the first draft Q&A and at that time included Q6 not for promotional means but to provide motivation. If the Q&A was intended to provide basic information about the Q&A concept, he could agree to delete Q6.

7. Presentation on UI to WP.29 subsidiary bodies.

The Secretary explained that a revised version of the presentation to WP.29s subsidiary bodies, document DETA-44-03e rev1, was drafted, including the proposed advise to not develop summary documents for UN Regulations where no additional marking information is required and no benefit expected from the UI marking. In addition explaining that when for these regulations the UI marking would be applied anyway, the additional information can be obtained from the attributes available by the web service.

The Chair concluded that the presentations would be on hold until the issue on application of the UI marking 'by default' vs. the explicit enabling of the UI marking by UN Regulations, is clarified.

8. Amending 'UI guidelines document' ECE/TRANS/WP.29/2022/62.

The Secretary explained that the Task Force session identified various omissions in the UI guidelines document. In addition, OICA submitted written input on the guidelines document. These are collected in document DETA-44-06e. The entire UI guidelines document need to be reviewed again. The group agreed that another task force session would need to be organised to discuss both this document as well as the draft Q&A on UI. The Chair added to inform the group by mail soon with further details. The expert from OICA requested to hold this session in hybrid format.

9. Report to WP.29.

The Chair provided a first draft of the status report to WP.29, document DETA-44-07e, and briefly explained its content. The UNECE secretariat offered to contribute by mail after the session with language explaining the UI issue to WP.29. The Chair, Secretary and UNECE secretariat would update the status report after the session in line with the decisions taken.

10. AOB.

- **Access rights to DETA for technical services.**

The Chair explained that the IWG discussed two sessions ago the question raised by Japan whether Technical Services may get access to DETA. The IWG then provisionally agreed that Contracting Parties may allow Technical Services to access DETA in case these Technical Services are performing an authoritative task under governmental control while other Technical Services being commercial economic operators, shall not be allowed access. The Secretary added that the Focal Points of the Contracting Parties should ensure that the credentials for accessing DETA are forwarded correctly. The expert from OICA expressed support. The Chair concluded to advise WP.29 accordingly. This would also be included in the status report to WP.29 (document DETA-44-07e rev1).

- **Access rights in the course of PTI.**

Discussed under agenda item 4.

- **Follow-up ETRTO's proposal for partitioning of documents and file names in DETA.**

Postponed for reasons of time. The expert from ETRTO expressed concern about the postponement. He stressed that the issues raised in document DETA-41-08e rev1 were important to the ETRTO members and that it was postponed before. He requested to consider the proposal during the next DETA session.

11. Next meetings.

The IWG considered holding its next session on 10 November at the UNECE in Geneva so this can be combined with the 11 November IWVTA IWG session taking place at the same location. This is pending confirmation of the meeting room availability.
