Proposal for a new supplement to the 03, 04, 05 and 06 series of amendments to UN Regulation No. 78

Proposal to adapt the deceleration threshold also to S-EPAC for the 03, 04, 05 and the new 06 series of amendments to UN Regulation No. 78.

I. Proposal

Paragraph 9.3.2., amend to read:

- "9.3. Stops on a high friction surface
- 9.3.2. Performance requirements

When the brakes are tested in accordance with the test procedures referred to in paragraph 9.3.1.:

- (a) The stopping distance (S) shall be:
- (i) In general, $S \le 0.0063 V^2$ (where V is the specified test speed in km/h and S is the required stopping distance in metres) or the MFDD shall be $\ge 6.17 \text{ m/s}^2$; or
- (ii) In case of pedal-driven vehicles of Category L_1 with auxiliary electric propulsion, $S \le 0.0056V2/P$ (where V is the specified test speed in km/h, P is the peak braking coefficient and S is the required stopping distance in metres) or the MFDD shall be ≥ 6.87 x P, in m/s2; [and]
- (b) There shall be no wheel lock and the vehicle wheels shall stay within the test lane."

II. Justification

A. Background

- 1. In certain conditions, ABS can offer benefit in terms of cycling safety as it optimizes the trade-off between bicycle stability and deceleration.
- 2. ABS can work only within the physical limits of the bicycle (friction of tire & road, center of gravity of rider & bicycle, etc.)
- 3. ABS has, as all technical systems, a level of efficiency compared to rider's best performance (pro rider who knows when & how to brake).

B. Applicable standards

- 4. ABS is optionally available for both type-approved and non type-approved e-bikes (such as the S-EPAC, which is a vehicle of subcategory L1e-B according (EU) 168/2013)), hence UNECE R78 is applicable to S-EPAC.
- 5. Current design of the UN R78 targets ABS technology on powered two wheelers (PTWs) such as mopeds and motorcycles which have different physical limits (cf. slide 2 in informal document GRVA-18-39)

C. Issue

6. The center of gravity (CoG) of S-EPACs combined with the level of efficiency of every ABS does not fit to the braking test "Stops on high friction surface" (chapter 9.3) which includes a vehicle independent deceleration threshold of 6.17m/s² (cf. slide 2 in informal document GRVA-18-39)

D. Proposal:

- 7. Changing the deceleration threshold definition from a vehicle independent one to a vehicle dependent one as in braking test "Stops on low friction surface" (chapter 9.4) enables a better fit of UN R78 to S-EPACs (cf. slide 3 in informal document GRVA-18-39)
- 8. The definition introduced in para. a.2. is based on the definition used in UN R63 (noise), para. 1. Scope

E/ECE/324/Rev.1/Add.62/Rev.1/Amend.4
E/ECE/TRANS/505/Rev.1/Add.62/Rev.1/Amend.4

Paragraph 1, amend to read:

"1. Scope

This Regulation applies to vehicles of category L₁¹ with regard to sound emission. Pure electric vehicles, including vehicles with auxiliary electric propulsion, are not in the scope of this Regulation."

Annex 3,

Paragraph 2.2.1., amend to read:

"2.2.1. General condition