15.1.1. Backing event starts when the vehicle is in Active vehicle mode and the vehicle's direction selector is placed from forward, park or neutral into reverse by the driver or a system, and ends when one of the following forward motion conditions, at the manufacturer's choosing, is met:

(a) A speed \( \leq 16 \text{ km/h} \) (including 0 km/h is included), or

(b) A distance travelled \( \leq 10 \text{ meters travelled} \) (including 0 meters is included), or

(c) A continuous duration \( \leq 10 \text{ seconds} \) (including 0 seconds is included), or

(d) the vehicle's direction selector is not placed in reverse.
Detection Response time

17.3.1.  Response time

At least one of the audible or haptic information signals that meets the requirements as described in 17.2., shall be given signalled to the driver after within a maximum of 0.6 seconds after the start of the backing event, and when tested according to paragraph 2. of Annex 10.

*Justification: it shall not be required to give a signal after max. 0.6s after start of the backing event when there is no object in the detection area.*
RVC testing procedure

Annex 9 1.2

(e) Place test objects G, H, and I so that their centres are in a transverse vertical plane that is $3.5 \ 3.35$ m to the rear of a transverse vertical plane tangential to the rearmost surface of the rear bumper.

Justification: End of the 3\textsuperscript{rd} row pole located at 3.5m. Therefore, pole center is located at 3.35m.
RVC testing procedure

Annex 9 1.4 Test procedure (modification in red):
The visibility of each pole shall be tested one by one.
Optional, one row can be tested at the same time.
After successful pole identification, the pole can be removed.
The poles of the first row (A, B, C) may rotate direction in order to be visible the painted patch as much as possible.

Motivation:
- Getting clarity and avoid misinterpretation
- 1.2 explains the test setup (location and orientation)
- Figure B shows all test objects location
- Potential interpretation by the technical service that the poles shall be identified one by one, but all 9 poles should be kept in the position.
- E.g depending on the camera mounting position, pole B can mask pole E and H, or pole E can mask pole H
RVC response time testing procedure

Response time (2.0 sec) should be measured at normal temperature as it is in FMVSS 111:

S14.2. Image response time test procedure.
The temperature inside the vehicle during this test is any temperature between 15 deg. C and 25 deg. C.
Wording

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