## Japan Comments_Part 1 on EVE GTR

### Main Body

#### Definitions

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<th>Urgency or closed date</th>
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For any terms not herein defined, the definition set out in UN GTR No. 15 shall apply

- deleted with no discussion and with no [ ]
- high
- high
- 1. may lead unnecessary conflict with other GTRs (e.g. same terminology but different meaning and use versa)
- 2. quite efficient to refer the existing GTR

3.x. Battery/Rechargeable electrical energy storage system

- open
- high
- high
- make it clear what kind of batteries (REESSs) will be applicable and the appropriate terminology in this GTR
- exclude non-traction REESSs (i.e. 12V auxiliary battery) REESS is OK for US/Canada ? please refer appendix3

3.x. UBE/Electric Range

- describe calculation formula
- open
- high
- high
- 1. inappropriate to describe the calculation formula in definition
- 2. "test procedure used for certification" refer a variety of test procedure. Better to make it clear. e.g. Types I in case of GTR#15, delete the whole calculation formula then create new Annex to clarify the test procedure and the calculation process for each performance parameter (please refer the appendix1)

3.x. UBE

- In the confirmation cycle or charge-balanced cycle, the energy balance shall be considered and corrected to a charging balance neutral energy balance.
- open
- high
- high
- need to make it clear how to "correct to a charging balance neutral energy balance"
- delete, then define correction methodology in new Annex based on IWG agreement

3.x. Minimum Performance Requirement/Declared Performance Requirement

- open
- none
- high
- same description in main body
- deleted from definition section

3.x Certified usable battery energy

- open
- mid
- high
- better to use same terminology "certified UBE" or "certified energy"
- "certified UBE"

3.x Measured usable battery energy

- Measured range
- open
- mid
- high
- use terminology in definition section only
- delete from definition section

3.x. SDOR/SOCO monitor

- Estimated SDOR/SOCO
- Measured SDOR/SOCO
- open
- none
- high
- may have a chance to modify only one portion, then create unnecessary confusion
- delete from definition section

### Requirements

5.1. shall determine the algorithms by which estimated SDOR and estimated SOCE are determined for the vehicles they produce

- closed
- low
- high
- additional comments>
- estimated, including estimated SOCE/SDOR may mislead unnecessary criticism (regulate with estimated value?) better to use the harmonized terminology
- how about "on-board" ? in line with OBFCM wordings

The estimated SDOR and SOCE shall be rounded to the nearest whole number/first decimal place according to paragraph 7 of this UN-GTR.

- open
- high
- high
- please refer JPN comments_Part 2

5.2. In the second case, the values shall apply from the start of the life of a vehicle up to 8 years or 160,000 km, whichever comes first

- closed
- low
- high
- clarify the meaning of the text
- In the second case* means 8 years or 160,000km ? If so, how about "first case" ? described in Table clearly
- can be deleted

Table 1/2 MPRI

- open
- high
- high
- support proposed text
- delete [ ]

The manufacturer shall ensure that batteries installed in vehicles will perform equal or better than the MPRI (or DPRI if applicable)

- closed
- high
- high
- conflict with para. 6.4.2.
- delete "The manufacturer shall ensure that batteries installed in vehicles will perform equal or better than the MPRI (or DPRI if applicable)"

6. In-Use Verification

6.1. with respect to verification of the SDOR/SOCO monitors

- closed
- none
- high
- editorial error
- with respect to verification of the estimated (or on-board) SOCE/SDOR
- please refer JPN comments_Part 2

monitor family may be extended in the case of a different algorithm or BMS if there is sufficient evidence that the performance of the monitor will not be affected other systems that might influence the electric energy consumption of the vehicle

- closed
- mid
- high
- different algorithm can be same family ? including tyre wear, brake friction, lamp malfunction and so on ?
- it's too much and ambiguous

6.2. Part A: Verification of SDOR/SOCO monitors

6.3.1. The verification of the monitors shall not be mandatory if the annual sales of the monitor family are less than 5,000 vehicles in the market for the previous year. Such in-service conformity families may still be selected to be tested for Part A, at the request of the responsible authorities

- open
- high
- high
- please refer JPN comments_Part 2

6.3.2. (whole number/first decimal place)

- open
- high
- high
- please refer JPN comments_Part 2

6.3.4. Statistical Method for Pass/Fail decision for a sample of vehicles

- open
- high
- high
- please refer JPN comments_Part 2

Option x or SOC_read/(SOCMeasured)

- open
- high
- high
- please refer JPN comments_Part 2

Option y = factor A shall be set at [1.01]

- open
- high
- high
- depend on the resolution of on-board SOCE/SDOR
- please refer JPN comments_Part 2

If the number of vehicles in the sample is less than [500], then presence of a flag of the monitor triggered by Cases B of Annex 2 shall be used to decide whether the vehicle has been abnormally used and therefore should be excluded from the sample. All vehicles with a flag of the monitor according to Annex 2, Case A shall be excluded from the sample

- open
- none
- high
- clarify the meaning of the text
- please refer the appendix2

7 Rounding

- added with no discussion and with no [ ]
- low
- high
- delete whole section if IWG agree that no rounding is necessary, otherwise refer GTR#15 para. 7. in main body

### Annex 1

Vehicle Owner Interview

Was the vehicle stored and not used for more than one full month during its life? If so, how many times per year?

- added with no discussion and with no [ ]
- low
- high
- clarify the meaning of this survey (seems to be same content as Annex/Case_B)
- please refer the appendix2

### Annex 2

- open
- high
- high
- please refer JPN comments_Part 2