**EDR/DSSAD IWG Recommended Revisions with Justifications to SIG ALKS DSSAD Proposal to Modify DSSAD for ALKS Provisions to Address Heavy Duty Vehicles**

Revised proposal in “tracked changes” -

*Paragraph 8.4.3.,* delete and replace by new heading with subparagraphs to read:

“8.4.3. ~~The data shall be retrievable even after an impact of a severity level set by UN Regulations Nos. 94, 95 or 137. If the main on-board vehicle power supply is not available, it shall still be possible to retrieve all data recorded on the DSSAD, as required by national and regional law.~~

 **Retrievability of data**

**8.4.3.1.** **For vehicles of Category M1 and N1 the data elements listed in paragraph 8.3.1 shall be retrievable evenafter an impact of a severity level set by UN Regulation~~s~~ Nos. 94, 95 or 137 as applicable.**

**8.4.3.2. For vehicles of Categories M2, M3, N2 and N3, the following applies.**

**Either:**

**(a) The data elements listed in paragraph 8.3.1 shall be retrievable even after a mechanical shock to applicable on-board data recording devices, if any, at ~~of~~ a severity level as specified in the component test of Annex 9C of the 03 series of amendment to UN Regulation No. 100, and**

**(b) Any on-board device(s) utilized to meet this requirement by recording data elements listed in paragraph 8.3.1 ~~The DSSAD~~ shall be mounted in the vehicle cab/passenger compartment or shall be mounted in a position, or be of sufficient structural integrity, ~~such as~~ to ~~be~~ protect~~ed~~ against mechanical damage that would preclude retrieval of the data resulting from a typical vehicle crash (e.g. frontal impact). This shall be demonstrated to the technical service together with appropriate documentation (e.g. calculations or simulations);**

**Or, alternatively,**

**~~Sufficient~~ Crash protection of any on-board recording devices used to record data elements listed in paragraph 8.3.1, may be demonstrated by the manufacturer by fulfilling the requirements of paragraph 8.4.3.1. (e.g. for M2 / N2 vehicles derived from M1 / N1).**

**8.4.3.3. If the main on-board vehicle power supply is not available, it shall still be possible to retrieve all recorded data elements listed in paragraph 8.3.1 ~~recorded on the DSSAD~~, as required by national and regional law.”**