**EDR/DSSAD IWG Recommended DSSAD Provisions for Application of ALKS to Heavy Duty Vehicles.**

The EDR/DSSAD IWG reviewed the concerns from the EC and UK following the last GRVA meeting and believes that the revised regulatory text below addresses these concerns.

In addition, the IWG noted that the proposal originally submitted to GRVA contained some redundancies (e.g., repeating reference paragraph 8.3.1 in each subsection, when it was sufficient to only reference it once in the main section). As a result, the proposed regulatory text was “tightened up” to remove redundancies and enhance clarity and understanding of the requirements..

Proposed Regulatory Text:

~~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 even after an impact of a severity level set by UN Regulation Nos. 94, 95 or 137 as applicable.**

**8.4.3.2. For vehicles of Categories M2, M3, N2 and N3, the data elements listed in paragraph 8.3.1 shall be retrievable even after an impact. To demonstrate that capability, the following applies:**

**Either:**

**(a) After a mechanical shock applicable to on-board data storage devices, if any, at 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) On-board data storage device(s) shall be mounted in the vehicle cab/passenger compartment or mounted in a position of sufficient structural integrity to protect against physical damage that would prevent the retrieval of data. This shall be demonstrated to the technical service together with appropriate documentation (e.g. calculations or simulations);**

**Or,**

**(c) The manufacturer demonstrates 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, as required by national and regional law.”**