

OICA Comments

DRAFT Proposal regarding Uniform provisions for periodical technical inspections of accident emergency call systems

(Reference: PTI-25-03)

Vehicle manufacturers welcomes the proposal from Russian Federation (PTI-25-03) at UNECE level, as this have a direct effect on the safe operational condition of the vehicles and ensuring safety of the vehicle occupants. As agreed during 25th IWG-PTI held on 15th Dec 2021, please find OICA submission on the draft proposal:

(A) UN-R144 as a basis of deriving PTI requirements

We foresee an absolute need for clarification of these important items beforehand and adopt the draft proposal and in many context, review of this proposal by GRSG experts is necessary for appropriate guidance.

1. eCall (AECS) PTI provisions laid out in EU cannot be taken vis-a-vis for purpose of PTI requirements for regulations made under 1958 agreement.

eCall in EU is regulated via (EU) 2015/758. The eCall functionality needs to be tested with regard to contact with PSAP and needs compatible infrastructure. We do not see this compatible infrastructure existing in majority of UN contracting parties. Therefore, only requirements standardized via regulations under 1958 agreement, shall be included in the rules under 1997 agreement. Therefore, if such arrangements of self-test with a display is specified in UN-R144, in this case only this display shall be sufficient as a read out for the PTI.

UN-R144, Amendment 1:

Cl. 26.5.3. A warning signal shall be provided in case of AECS internal malfunction. Visual indication of the AECS malfunction shall be displayed while the failure is present. It may be cancelled temporarily, but shall be repeated whenever the ignition or the vehicle master control switch is being activated (whichever is applicable)."

2. As per UN-R144, it is clearly stipulated that the regulation do not applies for Periodical Technical Inspection (PTI) Cl. 1.2(d). Therefore, from procedural view point, we are unable to understand how at this stage, AECD (Accident Emergency Call Device) can be applicable for Periodical Technical Inspection.
3. UN-R144 excludes certain vehicles from the scope of AECD requirements, such as vehicles:
 - a) In the scope of neither UN Regulation No. 94 nor UN Regulation No. 95 and not fitted with an automatic triggering of an AECS;
 - b) Of category M1 with a total permissible mass above 3.5 t; and
 - c) Armoured vehicles

Therefore, the scope of this proposal needs to take into account the stated requirements stipulated in applicable UN-R144 revisions and series of amendments.

(B) Proposed amendments in respective sections of draft proposal

1. Scope

1997 Agreement needs to be specified clearly and the requirement shall apply to vehicles with a design speed exceeding 25km/h

“Cl. 1.2 Wheeled vehicles as defined in paragraph 2.4 used in international transports shall satisfy the requirements set out below”. This sentence binds to meet the requirement of this rule in International Transports. As you are aware eCall reception / functionality in different countries for e.g., Russia, Turkey, EU, etc. are based on different configurations and PSAP communication setups (for e.g., ERA GLONASS, GALILEO, Local SIM, Roaming contracts, etc.). Mandating such requirements goes beyond the scope of UN-R144 and national sovereignty. Therefore wheeled vehicles used in international transports shall be removed from the scope.

2. Definitions

Definitions from Cl. 2.1 to Cl 2.7 can be directly referred to the Rule 1 for simplification of rules and to avoid duplication

Scope of vehicle categories stipulated in Cl. 2.4 (M2, M3, N2, N3) is not right. Scope of vehicle categories shall be inline as stipulated in UN-R144 revisions and series of amendments.

Further, Cl. 2.9 shall be deleted and the reference to UN-R144 shall be made to avoid any uncertainty. We see no reason to duplicate the definitions on functionality.

3. Periodicity of technical inspection

We propose four years after the first entry into service of the first registration and every second two years thereafter.

4. Technical inspection

Propose to amend to read the paragraph as *“Following verification, the International Technical Inspection Certificate shall confirm the compliance with at least the provisions of the ANNEX.”*

5. Inspection requirements

eCall by definition consist of these components and functioning of same is verified through ANNEX, which is primarily the purpose of PTI concept.

Listing detailed inspection requirements is duplicating the ANNEX requirements and could be interpreted wrongly, leading to physical checks. We should aim to synchronize the framework as stipulated in EU 2021/1717 and this existing EU precedence shall be considered in this context.

6. Method of Inspection

Provision stated is unclear and contains a wide interpretation especially for the purpose of this draft rule (eCall) *“ Where a method of inspection is given as visual, it means that in addition to looking at the items, the inspector can also handle them, evaluate noise, etc.”*.

From our view, ANNEX serves as the overall criteria to check the PTI requirements for eCall functionality in a vehicle. We also accept that ANNEX requirements can be stated as minimum requirements. But, requirements laid out on top of this rule is a subject of national requirements and sovereignty.

ANNEX- Minimum Inspection requirements

As stipulated in UN-R144, Cl. 26.5.3, a warning signal is provided in case of AECS internal malfunction. Visual indication of the AECS malfunction is displayed while the failure is present.

Principally, this is a simplified way to conduct PTI check for eCall system malfunction.

We understand that authorities are concerned on MIL manipulation. This can be resolved in future by the adoption of technical requirements of ISO 20730 Part 1, 2 & 3 which requires vehicle functional check only if diagnosis is not successful.
