	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
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GRSG informal group on Accident Emergency Call System (AECS) List of disagreements of AECS members on the issues of the draft Regulation

Japan basic position:

AECS-03-04 includes specific national requirements for the wireless communication systems or network providers. Such specific national requirements are not suitable for the requirement under the 1958 Agreement. Therefore, those requirements should be handled by the each Contracting Party.

With regard to data transfer to the PSAP, its success depends on wireless data communication environment in the each Contracting Party. Since the countermeasure for improving the success rate of data transfer should be addressed by the each Contracting Party based on each country's situation, such requirements should not be included in UN Regulation.

## 6. Requirements

The effectiveness of	The effectiveness of	The effectiveness of
AECD shall not be	AECD shall not be	AECD shall not be
adversely affected by	adversely affected by	adversely affected by
magnetic or electrical	magnetic or electrical	magnetic or electrical
fields. This	fields. This	fields. This requirement
requirement shall be	requirement shall be	shall be met by ensuring
met by ensuring	met by ensuring	compliance with
compliance with	compliance with	Regulation No. 10:
Regulation No. 10:	Regulation No. 10:	
	AECD shall not be adversely affected by magnetic or electrical fields. This requirement shall be met by ensuring compliance with	requirement shall be met by ensuring compliance with requirement shall be met by ensuring compliance with

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
	(a) 03 series of amendments for vehicles that do not have a rechargeable energy storage system (traction battery) that can be charged from an external source;	[6.1.1. AECD shall be designed, constructed and installed in such a way that the vehicle when equipped shall continue to comply with the relevant technical requirements, especially with regard to electromagnetic compatibility (EMC).]	[6.1.1. AECD shall be designed, constructed and installed in such a way that the vehicle when equipped shall continue to comply with the relevant technical requirements, especially with regard to electromagnetic compatibility (EMC).]				
	(b) 04 series of amendments for vehicles fitted with a rechargeable energy storage system (traction battery) that can be charged from an external source.	[6.1.2. Vehicles which are equipped with AECD shall comply with the relevant technical requirements, especially with regard to electromagnetic compatibility (EMC).]	[6.1.2. Vehicles which are equipped with AECD shall comply with the relevant technical requirements, especially with regard to electromagnetic compatibility (EMC).]				
		6.1.3. The effectiveness of AECD shall not be adversely affected by magnetic or electrical fields REFERENCE TO ISO-7637 SECTION XXX	AECD shall be tested for radiated and conducted emissions, for immunity to radiated and conducted disturbances.  [inspired by Reg.10 clause 6.1.1.2].	EMC compatibility should follow the existing standards			
6.1.3.1			AECD shall be tested for immunity to electromagnetic radiation. AECD immunity type	-			

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			approval limits and conformance test methods in accordance with Regulation No. 10 (clause 6.7 and Annex 9).				
6.1.3.2			Narrowband type approval limits concerning narrowband electromagnetic interference generated by AECD and conformance test methods in accordance with Regulation No. 10 (clause 6.6 and Annex 9).	-			
6.1.3.3			Immunity of AECD against disturbances conducted along supply lines				
			Apply test pulses 1, 2a/2b, 3a, 3b, 4 and 5a/5b according to the International Standard ISO 7637-2:2004 to the supply lines as well as to other connections of AECD which may be operationally connected to supply lines.	-			
			Concerning pulse 5, pulse 5b shall be applied on vehicles which include an alternator with internal limitation diode and pulse				

RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
		5a shall be applied for others cases.  Concerning the pulse 2, pulse 2a shall always be applied and pulse 2b could be performed with the agreement between the vehicle manufacturer and the technical approval services.  AECD in unset state and set state  The test pulses 1 through 5 shall be applied. The required functional status for all applied test pulses are given in table 1.  Table1— Severity/functional status (for supply lines)				
		Test pulse number level status  1 III C 2a III B 2b III C 3a III A 3b III A 4 III B 5a/5b III A				

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
6.1.3.4			Specifications concerning the emission of transient conducted disturbances generated by AECD on supply lines and conformance test methods in accordance with Regulation No. 10 (clause 6.9).	-			
6.1.3.5			Immunity of AECD against disturbance coupled on signal lines.  Leads which are not connected to supply lines (e.g. special signal lines) shall be tested in accordance with the International Standard ISO7637-2:2004. The required functional status for all applied test pulses are given in table 2.	-			
			T a b l e 2 – Test level / functional status (for signal lines)  Test pulse Test Function number level al status  3a III C  3b III A				
6.1.3.6			Tests concerning the immunity of AECD to	-			

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			electric interference created by electrostatic discharge are set up according to test methods described in ISO/TR 10605-1993 or EN 61000-4-2.				
6.1.3.7			AECD shall comply with requirements EN 301 489-1 V1.8.1 (2008-04), EN 301 489-7 V1.3.1 (2005-11) and EN 301 489-24 V1.4.1 (2007-09) concerning communication on mobile telephone communication networks.	-			
6.2	The AECD shall be climate resistant. This requirement shall be deemed to be met if the AECD has withstood all tests prescribed in annex 6.	The AECD shall be climate resistant. This requirement shall be demonstrated by compliance with the performance requirements of Annex 6 / REFERENCE / copy/paste of paragraph 6.4. of R116	The AECD shall be climate resistant.  All components of the AECD shall operate without any failure under the following conditions.  [Inspired by Reg. 116 clause 6.4.	-40 degC could create issues for battery usage and charging. We recommends to limit the call back period for temperatures below -20 degC			
6.2.1			Climatic conditions  Two classes of environmental temperature are defined as follows:  (a) -40°C to +85°C for	-		Regarding the paragraphs 6.2.1 to 6.2.4, Study reservation (We would like to know the justification)	

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			parts to be fitted in the passenger or luggage compartment,  (b) -40°C to +125°C for parts to be fitted in the engine compartment unless otherwise specified.				
6.2.2			Degree of protection for installation:  The following degrees of protection in accordance with IEC Publication 529-1989 shall be provided:  (a) IP 40 for parts to be fitted in the passenger compartment,				
			(b) IP 42 for parts to be fitted in the passenger compartment of roadsters/convertibles and cars with moveable roofpanels if the installation location requires a higher degree of protection than IP 40,	-			
			(c) IP 54 for all other parts.  The AECD manufacturer shall specify in the installation instructions any restrictions on the positioning of any part of				

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
6.2.3.			the installation with respect to dust, water and temperature.  Weatherability:  7 days according to IEC 68-2-30-1980.  Requirement 6.2.1 – 6.2.3 shall be demonstrated with test methods described in	-			
			Annex 6.				
6.3.	The AECD shall be resistant to mechanical impact. This requirement shall be deemed to be met if the AECD has withstood all tests prescribed in annex 7.	The AECD shall be resistant to mechanical impact. This requirement shall be demonstrated by compliance with the performance requirements of Annex 7 / REFERENCE / copy/paste of paragraph XX of Standard YYY	The AECD shall be resistant to mechanical impact.  All components of the AECD shall operate without any failure under the following conditions.	The requirements should be equivalent to international or Russian standards		Regarding the paragraphs 6.3 to 6.3.3, Study reservation (We would like to know the justification)	
6.3.1			Vibration conditions:  The AECD components are subdivided into two types:  Type 1: components normally mounted on the vehicle,  Type 2: components				

RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
		intended for attachment to the engine.				
		The components/AECD shall remain operational under a sinusoidal vibration mode characterised as follows:				
		For type 1				
		The frequency shall be variable from 10 Hz to 500 Hz with a maximum amplitude of " 5 mm and maximum acceleration of 3 g (0-peak).				
		For type 2				
		The frequency shall be variable from 20 Hz to 300 Hz with a maximum amplitude of " 12 mm and maximum acceleration of 15 g (0-peak).				
		For both type 1 and type 2				
		The frequency variation is 1 octave/min.				
		The number of cycle is 10, the test shall be performed along each of the 3 axes.				
		The vibrations are applied at low frequencies at a maximum constant amplitude and at a maximum constant				

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			acceleration at high frequencies.				
6.3.2			Shock conditions:				
			AECD should remain operational during and after repeated shocks in each of three mutually perpendicular positions with the following values of influencing factors:				
			- peak shock acceleration – 98 m/s2 (10 g);				
			- shock repetition frequency – no more than 80 shocks/min;	-			
			- shock duration - from 5 to 15 ms (preferably - 10 ms);				
			- the number of shocks in each direction – 3333 (overall number of shocks – 10000).				
6.3.3			Requirements 6.3.1 - 6.3.2 shall be demonstrated with test methods described in Annex 7.	-			
6.4.	The AECD shall remain operational after the dynamic testing in accordance	The AECD shall remain operational after frontal impact. This shall be	The AECD shall remain operational after frontal impact. This shall be demonstrated by	To have a meaningfull system, AECS must be able to sustain certain level of shock. E94 E95			

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
	with the appendix to annex 9 of Regulation No. 17. Details of the test procedure are given in annex 8.	demonstrated by compliance with the performance requirements of Annex 8 REFERENCE / copy/paste of Annex 9 to R17	withstanding the test pulse described in annex 9 - appendix of Regulation No. 17.	tests conditions is a possible reference.			
6.5	The AECD shall ensure reception and processing of standard precision navigation signals. This requirement is deemed to be met if the AECD has withstood all tests prescribed in annex 9.	The AECD shall be capable of proper reception and processing of standard precision global positioning signals. This shall be deemed to be fulfilled if the Global Navigation Signal System Receiver is compliant with CEP95.	The AECD shall be capable of proper reception and processing of standard precision GNSS signals. The AECD GNSS receiver shall comply with requirements 6.5.1 – 6.5.7	CEP 95 defines the precision of positionning. GPS and GLONASS and Galileo standards and chipsets (soon for Galileo) are available and sufficient. Moreover the positionning can be made more accurate with map matching and additional devices in the vehicle.		Regarding the paragraphs 6.5 to 6.5.8, we can support OICA proposal AECS-02-02 if the proposal aimed for developing a quantification requirement.	
6.5.1			The GNSS receiver shall receive and process the signals from at least two global satellite navigation systems.	-			
6.5.2			The GNSS receiver shall operate and provide navigation solution with accuracy of 15 m at confidence factor 0,95 in horizontal plane at speed up to 250 km/h.	-			

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposa AECS-03-04	al C	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
6.5.3			The observation in shall not exceed GNSS data output shall be configurable.	1 sec.	-			
6.5.4			Re-acquisition time block out of 60 sec not exceed 5 sec.		-			
6.5.5			Time to first fix ignition start shall exceed 60 sec.		-			
6.5.6			Sensitivity at reinput shall be acqui at least minus 163 D	isition:	-	-		
			tracking: at least 188 Dbw	minus				
6.5.7			The navigation receiver s comply with requirement 6.5.6 while operating at s level of minus 161 Dbw a receiver input under influ harmonic and pulse interf signals described in Table and 3.	is 6.5.1- ignal at the tence of ference				
			T a b l e 1 – Threshold v harmonic interference for stability test (GLONASS	r	-			
			Frequency, interf	eshold ales of ference mals,				

RUS AECS-02-02	OICA proposal AECS-02-02	RUS pr AECS	<b>coposal</b> -03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
		F < 1540	Minus 15				
		1540 < F ≤ 1562	From minus 15 to minus 50				
		1562 < F ≤ 1583	From minus 50 to minus 90				
		1583 < F ≤ 1593	From minus 90 to minus 140				
		1593 < F ≤ 1609	Minus 140				
		1609 < F ≤ 1613	From minus 140 to minus 80				
		1613 < F ≤ 1626	From minus 80 to minus 60				
		1626 < F ≤ 1670	From minus 60 to minus 15				
		F> 1670	Minus 15				
		T a b l e 2 – Three harmonic interfere stability test (GPS)	ence for				
		Frequency, MHz	Threshold values of interference signals,				

RUS AECS-02-02	OICA proposal AECS-02-02	RUS pi AECS	roposal -03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			Dbw				
		F < 1525	Minus 15				
		1525 < F ≤ 1565	From minus 50 to minus 140				
		1565 < F ≤ 1585	Minus 140				
		1585 < F ≤ 1610	From minus 140 to minus 60				
		1610 < F ≤ 1626	From minus 60 to minus 50				
		1626 < F ≤ 1670	From minus 50 to minus 15				
		F> 1670	Minus 15				
		T a b 1 e 3 – Inteference pulse parameters for stability test					
		Parameter	Value				
		Peak power, Dbw	Minus 10				
		Pulse duration, ms	≤1				
		Pulse duty cycle	≥10				

	RUS AECS-02-02	OICA proposal	DIIC managari	CI EDA managal			
I	AECS-02-02	AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
						1	
6.5.8			Requirements 6.5.1 - 6.5.7 shall be demonstrated with				
			test methods described in	-			
			Annex 9				
						1	
6.6.	[The AECD shall	[The AECD shall be	The AECD shall be	The requirements should		As for the	
	allow communications	capable of	capable of communication	be regional or national		requirements for	
	on mobile telephone	communication on	on mobile telephone			wireless	
	communications	mobile telephone	communication networks			communication	
	networks using GSM-	communication	using the following			systems or network of	
	900, GSM-1800,	networks.] [The AECD	standards:			the paragraphs 6.6. to	
	UMTS-900 and	shall be capable of	6 1:1 :			6.6.6.1, the	
	UMTS-2000 standards.	communication on	- for vehicles intended to			requirement for	
	The implementation of	mobile telephone	be marketed in EU: TBD			communications on	
	requirements for the	communication	6 1:1 :			mobile telephone	
	communication	network(s) of the	- for vehicles intended to			communications	
	module is confirmed	market where the	be marketed in Russia:			networks should be	
	by compliance with 3GPP TS 51.010-1	AECD is intended to	GSM-900, GSM-1800,			follow each country	
		be put on the market.] [The AECD shall at	UMTS-900 and UMTS- 2000			situation.	
	standard and following ETSI standards: ETSI	least be indicated in the	2000			WI h	
	TS 126 267, ETSI TS	national regulation of	- for vehicles intended to			*Japan basic position:	
	126 268, ETSI TS	the Contracting Party	be marketed in Japan:			AECS-03-04 includes	
	126 269. In addition,	where the AECD is	TBD			specific national	
	the AECD shall	submitted for approval	100			requirements for the	
	comply with the	[The Applicant shall	The implementation of			wireless	
	following	provide evidence of	requirements for the			communication	
	requirements:	compliance of capacity	communication module is			systems or network	
	requirements.	of communication on	confirmed by compliance			providers. Such	
		mobile telephone	with the following			specific national	
		communication	specifications:			requirements are not	
		network(s) of the	specifications.			suitable for the	
		markets where the	- for EU: TBD			requirement under the	
		AECD is intended to	101 20. 122			1958 Agreement.	
		be marketed by	- for Russia:			Therefore, those	

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
		documentation.]  identified in Annex XXX. This shall be demonstrated by compliance with 3GPP TS 51.010 1 standard and following ETSI standards:  — ETSI TS 126 267 DATE (eCall Data Transfer— General Description), — ETSI TS 126 268 DATE (eCall Data Transfer— Conformance testing), — ETSI TS 126 269 DATE (eCall Data Transfer— Conformance testing), — ETSI TS 126 269 DATE (eCall Data Transfer— Characterisatio n Report)  In addition, the AECD shall comply with the following requirements:	3GPP TS 51.010-1, ETSI TS 126 267, ETSI TS 126 268, ETSI TS 126 269, ETSI TS 124 008, 3GPP TS 34.121- 1, 3GPP TS 34.122 - for Japan: TBD			requirements should be handled by the each Contracting Party.  With regard to data transfer to the PSAP, its success depends on wireless data communication environment in the each Contracting Party. Since the countermeasure for improving the success rate of data transfer should be addressed by the each Contracting Party based on each country's situation, such requirements should not be included in UN Regulation.	
6.6.1			The AECD shall comply with the following rules of registration in the network serving emergency calls.	The new 6.6.1 article need to be explained and discussed.		We assure that requirements changed by the varied circumstances or infrastructures should	

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
						be handled by the each Contracting Party. Therefore, paragraphs 6.6.1. to 6.6.6.1. should be reorganized	
6.6.1.1			If the AECD is used only for emergency call service, then it shall comply with the requirements for the "eCall only mobile station" as defined in section 10.7 of ETSI TS 122 101. The AECD shall stay in the "eCall only mobile station" mode whenever ignition is turned on.				
6.6.1.2			If the AECD is used only for emergency call service and additional commercial services, and the requirements of additional commercial services do not prescribe that AECD is registered in the network, than AECD shall follow the requirements of section 6.6.0.1.				
6.6.1.3			Regardless the network registration status before emergency call request, upon reception of an emergency call request the AECD shall immediately				

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			register in the network serving emergency calls.				
6.6.1.4			Total time elapsed from the emergency call request until emergency call setup shall not exceed 20 sec.				
6.6.1.5			Upon completion of emergency call the AECD shall stay registered in the network serving emergency calls for 2 hours or until reception of deregistration commands, whatever happens earlier.				
6.6.2	The AECD shall be fitted with a non-removable personal multiprofile universal SIM card that functions on mobile telephone networks using the above-mentioned standards. It shall have the capacity to update information that is stored on the non-removable personal multiprofile universal SIM card on mobile telephone networks using the above-mentioned standards; [Other requirements to be regulated]	The AECD shall be fitted with a non-removable personal SIM that functions on mobile telephone networks using the standards mentioned in Annex XXX1. It shall have the capacity to upload update information that is stored on the non-removable personal SIM on mobile telephone networks, using the standards mentioned in Annex XXX1. [Other requirements to be regulated nationally]	The AECD shall be fitted with a non-removable SIM that functions on mobile telephone networks using the standards mentioned in section 6.6. Additional requirements to be regulated nationally.	Approved RUS proposal			

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
	nationally]						
6.6.3	The communications module shall provide batch transmission of data on the accident. The data exchange protocol shall establish mandatory priority flagging for emergency calls. The specifications for data exchange protocols are given in annex 10.	[The communications module shall provide batch transmission of data on the accident. The data exchange protocol shall establish mandatory priority flagging for emergency calls. The specifications for data exchange protocols are given in annex 10.]	When setting up an emergency call, the AECD shall set bits 6 and 7 of the service category element in accordance with ETSI TS 124 008.  The AECD shall enable the following mechanisms of data transmission:  - for EU: in-band data transmission in accordance with ETSI TS 126 267;  - for Russia: in-band data transmission in accordance with ETSI TS 126 267;  SMS in accordance with mobile communication standards listed in section	(Comment) Overall this is one approach to integrate in the main regulation key regional			

RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
		6.6; - for Japan: TBD. The AECD shall be able to generate / respond to the following messages (Table 4):	or national requirements. But it has the danger of becoming somewhat too specific			

	RUS AECS-02-02	OICA prop AECS-02-			US proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
Table 4	l. Requirements for data exc	change							
	Data and commands	Transm itting side	Receiv	ing side	Data transmission mechanism		Notes		
	MSD	AECD	PS	AP	In-band modem	Applicable for EU and Russia	[Japan?]. MSD format is describ	ed in Annex 14	
	MSD	AECD	PS	AP	SMS		]. The AECD shall send MSD via AECD shall also send MSD via		
Co	ommand to re-send MSD via S	MS PSAP	AE	CD	SMS				
Co	mmand to place an emergency	call PSAP	AE	CCD	SMS	Applicable for Russia [Japan?]	=	10	
Com	mand to deregister from the ne serving emergency calls	etwork PSAP	AE	CD	SMS	The specifications for data exc	change protocols are given in Ani	iex 10.	
MS	D containing AECD testing re	sults AECD	PS	AP	In-band modem	Applicable for Russia [Japan?] MSD format is described in A			
6.6.4	The communications module shall provide a full duplex voice connection in speakerphone mode, with an emergency services operator, the transmission of message about the vehicle by means of inband modem, functioning in mobile wireless communication standards GSM 900 and GSM 1800, UMTS 900 and UMTS 2000.	When fitted communications module shall full duplex connection speakerphone compatible with PSAP identification Annex XXX2.	provide voice in mode ith the	full di voice co PSAP u commun	CD shall provide uplex hands-free onnection with the using the mobile nication standards section 6.6.	Approved OICA proposal			

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
6.6.5	If it is not possible to transmit information using the voice modem for 20 seconds after the start of data transmission, the AECD stops using the voice modem and transmits the information by means of text messages (SMS). There shall be provision for the information to be transmitted a second time using the voice modem, working through the established voice connection, and by means of SMS. If it is not possible to transmit information using mobile telephone networks, the information not transmitted shall be stored in an energy-independent memory and transmitted when possible.	When fitted with full duplex voice connection capability, the AECD shall stop data transmission via in-band modem not later than [20] seconds after having started the demand, if no duplex voice communication can be established.	The AECD shall stop data transmission via in-band modem not later than [20] seconds after having started the demand, if in-band MSD transmission failed, and enable voice connection with PSAP. For Russia, in addition, the AECD shall immediately send MSD via SMS if in-band MSD transmission failed.  If the connection was interrupted before the AECD has successfully completed MSD transmission, while 20 sec since the demand have not elapsed, the AECD shall re-establish the call and initiate MSD retransmission by in-band modem.  If the connection was interrupted after the AECD has successfully completed MSD transmission, or after the 20 sec since the demand have elapsed, the AECD shall re-establish the telephone connection but shall not initiate the retransmission of MSD by in-band modem.	Approved RUS proposal			

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	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
			In case it was not possible to establish voice connection and/or send MSD using mobile communication networks listed in section 6.6, he AECD shall store the MSD in non-volatile memory and attempt retransmission when network service is available.				
5.6.6 A	Reception of command in SMS format concerning the repeat emergency call, and the issue of the repeat emergency call within a configurable period of time;	completed, the following sh	Processing of commands described in Table 4 (if applicable).				
5.6.6.2 <i>A</i>	Automatic reception of inc	oming phone calls for a pe	riod of not less than 20 minute	s after the emergency call.]			
6.7	The AECD shall offer the possibility of checking its functionality in automatic and manual modes, and show information on any faults on an optical device status indicator	The AECD shall provide the driver with a failure warning when there is a failure in the AECD that prevents the requirements of this Regulation of being met. The warning shall be as specified in	The AECD shall provide the driver with a failure warning when there is a failure in the AECD that prevents the requirements of this Regulation of being met. The warning shall be as specified in paragraph XXX below.				

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
	or a message on the instrument panel. It shall also be possible for device test results to be transmitted using mobile telephone communications networks as described in paragraph 6.5.	paragraph XXX below.	For Russia:  The AECD shall transition into test mode upon demand.  Upon transition into test mode the AECD shall make a test call and transmit the tests results via in-band modem using MSD format specified in Annex 14.  The AECD shall exit test mode upon successful transmission of the test results. The AECD shall also exit test mode if the AECD has been moved with ignition on a distance greater than 300 m from the location where test mode was entered.				
6.8	The AECD shall undergo functional testing in accordance with annex 11.	The AECD shall undergo functional testing in accordance with annex 11.	The AECD shall demonstrate compliance with functional requirements by undergoing functional testing in accordance with Annex 11.				
6.9	The AECD shall be able to operate autonomously for a	The AECD shall be able to operate autonomously for a	If fitted with backup battery, the AECD shall be able to operate				

	RUS AECS-02-02	OICA proposal AECS-02-02	RUS proposal AECS-03-04	CLEPA proposal AECS 03-12	EU proposal	Japan comment	Other proposal
	period of not less than 60 minutes in call-back mode and subsequently not less than 10 minutes in voice communication mode through the use of a backup battery when power is not available from the on-board electrical system. The lifetime of a backup battery shall be not less than three years.	period of not less than 20 minutes in call-back mode and subsequently not less than 5 minutes in voice communication mode.	autonomously for a period of not less than 60 minutes in call-back waiting mode and subsequently not less than 10 minutes in voice communication mode. The lifetime of a backup battery shall be not less than three years.				
6.10	The AECD shall have the capacity to function with additional external devices (including devices that detect the type of accident), connected by means of a standardized connector and a standardized data transfer protocol. The physical interface for data transfer shall offer a data transfer speed of not less than 62.5 kbps.						