Amendment proposal to the document AECS-02-02-Rev.2

The modifications to the existing text of the Regulation are marked in bold for new or strikethrough for deleted characters.

Proposals:

The paragraph 1.2., amend to read;

1.2. It does not apply to:

(a) Communication module and communication antenna functionality and contents of data which should be conveyed to PSAP, unless otherwise prescribed in this Regulation;

(b) The mechanism and logic of data transmission, data exchange protocol, operation modes and conditions of transitions between such modes, performance of the test call and test data transfer, response to protocol commands received from infrastructure and network registration logic;

(c) Privacy, data protection and personal data processing.

The paragraph 1.4., amend to read;

1.4. At the request of the applicant, this regulation may apply to GNSS connectivity. However, if the applicant opts to request approval to AECD/AECS without the GNSS connectivity assessment and approval sections, the Contracting Parties applying this regulation shall have the freedom to nationally assess and approve GNSS connectivity.

Although nothing in this Regulation shall prevent a Contracting Party applying this UN Regulation from specifying requirements for GNSS connectivity, the Contracting Parties applying this regulation shall accept the type approval if the vehicle type is fitted with GNSS receiver supporting at least three GNSS including GLONASS, Galileo and GPS, and is capable of reception and processing of SBAS signal meeting the requirements of this Regulation.

The paragraph 6.2., amend to read;

6.2. If AECD is fitted with GNSS receiver supporting at least three GNSS including GLONASS, Galileo and GPS, and is capable of reception and processing of SBAS signals at the manufacturer's discretion, then AECD shall comply with ....

Annex 9 (introduction), amend to read;

The following table lists the minimum set of data (MSD) in this UN Regulation that shall be conveyed during the eCall data transmission to the PSAP.

This Regulation shall not prevent a Contracting Party applying this UN Regulation from defining to exact format and additional elements.

The exact format and content is subject to national regulations.

Additional mandatory or optional elements may be subject to national regulations.
Justification:

Paragraphs 1.4. and 6.2.

Except for the case of the vehicle fitted with GNSS receiver supporting three GNSS (inc. GLONASS, Galileo and GPS) and SBAS signal meeting the requirements of this Regulation at the manufacturer’s discretion, this Regulation does not apply to the GNSS connectivity. Since the paragraph 1.4 is the scope, it is necessary to clarify the boundary of Contracting Party’s obligation to the acceptance of type approval. On the other hand, the condition which the fitting of the multi GNSS receiver is chosen by the manufacturer is clarified by the paragraph 6.2.

Paragraphs 1.2. and Annex 9

The Contracting Party has own national scheme for emergency helping system. In this case, the data required by emergency experts might be different. Therefore, excluding contents of data which should be conveyed to PASP from the scope of this regulation is necessary. Although “MSD” is included in this regulation, there is no contradiction because “unless otherwise prescribed in this Regulation;” are described in the provision of scope. And this UN Regulation should specify only common minimum list required by each Contracting Party who will apply this UN Regulation so that the Contracting Party can continue to manage their eCall national scheme in their market. It is necessary to clarify such Contracting Party’s right in those parts.