

TF-R39 9th Session

20240905

Chair : welcome everyone

Today we will prepare an informal document which is complementary to the official document ECE/TRANS/WP.29/GRSG/2024/36 which we submitted in the summer

Topics to be handled :

- **Odometer accuracy**
- **Malfunction indicator**
- **Anti-tampering (R155)**
- **Definitions**
- **Transitional provisions**

Chair : any questions or remarks to the items to be discussed?

Meeting Notes

2.6.4. definitions

Chair : we can start with the definition proposal by OICA, 2.6.4.

OICA : this is a clarification for the total distance value, the value made available for off-board purpose

Chair : any comments from members?

NL : it is a bit confusing, what is considered off-board? Is it over the air, or through serial port?

OICA : we don't define it, it is all possibilities

NL : it is then the same as the on-board value?

If it is only described as off-board, then the on-board value would not be considered

OICA : are you suggesting to remove off-board?

NL : yes, that is what I mean

OICA : we could also both mention on-board and off-board, however total distance indicated is what is shown in the vehicle

NL : it still is confusing, and additionally the deletion of any is not ok in my point of view

Chair : then we add 's' to value, and remove 'off-board the vehicle'

No objection from the members.

5.9. providing total distance values through serial port

Chair : a proposal from OICA, with a reference to R154

OICA : in R154 there is life time value, however this is not the same understanding we have for R39

Chair : we can also mention that life time value in R154 is not same as total distance value?

OICA : yes, we just have to make the difference between what is mentioned in R154 (appendix 5, § 2 definitions), which has a different meaning, and what is mentioned in R39

Chair : we can change the text 'to the total distance travelled (lifetime) as defined in UN Regulation No. 154

5.12. anti-tampering

Chair : there are comments from UK ('compliance with R155', proposal to remove the requirement as it should be a UN R155 requirement), OICA, Germany (additional justification to explain why we are referencing to R155; possible GRVA involvement; add 'state of the art encryption')

OICA : we have a problem when dealing with countries who do not apply R155, and the text is confusing for those countries. It is not clear that we can apply other means instead of R155 for those countries.

OICA : Small volume manufacturers have an exemption. Cyber security requirements are good, but not in relation to R155. OEM can propose a risk based approach to comply with cyber security requirements

France : we agree with the final intention, but the wording we use here is already discussed with WP.29 and other GR. There is no obligation for R155 approval as a result of this wording that was already in the official document. R155 is defining principles, but no clear ways to prove your cyber security.

I think the proposal as it was in the official document is clear enough to cover that R155 is not required. It might bring more confusion by adding the text proposed by OICA.

OICA : the problem that UK mentioned is relevant we think

Chair : I understand France's point, but I also see possibility of confusion

NL : I agree with France's comments. We don't require R155 approval, and even if you have R155 approval it does not mean you comply with R39 requirements regarding odometer anti-tampering.

We do agree that we can improve the language

OICA : I would like to hear comments from CP to UK's comments

'This shall be demonstrated by fulfilling...' could be deleted as mentioned by UK.

Chair : do we have any comments on deletion of this sentence?

Germany : we have several regulations which refer to R10, which use the same text 'demonstrate compliance with R10...'. I don't have another solution available.

Chair : by deleting the first sentence it seems ok

NL : deleting the first sentence is also ok for me

OICA : we don't think 'relevant' in point (a) is necessary. 'And' could be replaced by 'or'?

Chair : 'and' issue was already discussed in the past

NL : it should be 'and', 1st is management system (threat analysis risk assessment), 2nd is application to the product (specific requirements in relation to threat analysis and risk assessment for the vehicle)

NL : R39 approval is for unlimited series. There are possibilities in EU (small series approval), where R39 is limited in requirements.

'Relevant' is needed in point (a) in my opinion, as it means related to odometer.

OICA : we could add a paragraph 0 at the beginning of the regulation, to clarify what is needed. Justification will disappear after entry into force. But § 0 would remain.

Chair : it is possible to introduce § 0, but preferably through a formal document

OICA : maybe it is ok to bring the OICA proposal text into the justification text

France : we need to be careful about harmonization with other regulations.

We agree with removing the sentence 'this shall be demonstrated...', and to keep 'and' (instead of 'or').

Chair : we can delete the sentence, we removed the square brackets in (a) and we can move OICA's added text to the justifications.

5.8. accuracy

Chair : we have already received a lot of feedback and input for the odometer accuracy point

Sweden : we did not have a position before, but now we can support 5.0 % as proposed by OICA after receiving their information and explanation

Chair : no additional input from other members

We have had proposals for all of the options (5.0, 4.0, 2.5).

OICA : we showed data we obtained internally to the chair this week, based on EU destination vehicles, which highest grade of tyres. We conclude that 4.0 % is not reachable for all vehicles. Some vehicles are even out of 5.0 %.

For markets outside of EU, we can only estimate that accuracy will deteriorate. Tests were for light commercial vehicles.

We have to think about trucks as well.

Chair : I can confirm the data that was shared by OICA.

OICA : we would also like to hear justification why 2.5 % is safer vehicle wise compared to 5.0 %.

NL : I can only repeat what I mentioned before, based on data by SAE. For type approval we need to be more stringent compared to real life situation, because in real life situation it will only deteriorate regarding accuracy. 2.5 % is reasonable, but we can compromise for 4.0 %.

OICA : I want to clarify that the data was obtained during COP test for WLTP, with new tyres, vehicle just produced, so very close to homologation test condition

Germany : I can state that we have 4.0 % in our national regulation.

France : we had a lot of discussion, data etc. From our point of view we stay at our previous opinion of 4.0 %.

Chair : we heard from Sweden, France, Germany, NL.

UK mentioned in the past during GRSG 2.5 %. Is this still valid?

UK : we propose 2.5 %.

Chair : no other contracting parties present except the above. The range is 2.5 to 5.0 %. Majority is now 4.0 %.

Can we conclude on behalf of the contracting parties, or should we leave the square brackets and let GRSG decide?

Sweden : we can agree with 4.0 %, but it would be an unnecessary burden for OEMs to go for 2.5 %.

Chair : can we then agree with 4.0 % to present to GRSG?

France : I propose to keep only 4.0 % in the text, but with square brackets. We can ask for other views from other CPs, and mention that industry would choose 5.0 %.

UK : I can agree with square brackets and 4.0 %, as long as it is mentioned that there is no consensus, but compromise.

Chair : so we can agree with square brackets and 4.0 %, with justification as mentioned.

OICA : if we decide on 4.0 %, then we also have to develop a regulation on tyre requirements.

NL : OEM has the possibility to order tyres to the prescription of the OEM

OICA : we need to keep this 4.0 % in mind when deciding on transitional provisions.

We need to make a distinction between rubber and steel. Steel can have a more accurate dimension compared to rubber.

IMA : we ask to consider the technical specifications of motorcycles which are different with 'normal' vehicles, trucks etc. The contact of tyre with road varies greatly compared to other vehicle categories. R39 is widely applied in the world, also for countries not part of 1958 agreement. Because of this we want to request 5.0 % for L categories. In UN R75, there is a table with tyre size designation, with maximum and minimum diameter. There is a difference of 4.6 % mentioned.

Chair : do we have any views from CPs on this request for 5.0 % for L category?

Germany : the 4.0 % is valid for all categories in German national law.

NL : I'm not in favour of having different requirements for different categories. The requirement in R75 regarding diameter tolerance is an outer limit, as OEM you can request to have lower accuracy.

Additionally the test in annex 4 is on a straight road, where the contact of tyres for L category would not differ much.

Chair : we can leave the 4.0 % in square brackets. OICA and IMA can comment their views at GRSG.

5.11. malfunction indication

Chair : I think we generally agreed on the principle, but the wording was still under discussion.

Can we remove the square brackets?

OICA : we can agree to remove the brackets, but this will need to be kept in mind for transitional provisions.

Chair : we can remove the square brackets.

I have a small comment. This 5.11. paragraph falls under 5.10., we can specify with adding 'odometer' in front of requirement.

No objection from members.

10. Transitional provisions

Chair : addition of 10.9 and 10.10 paragraphs

OICA : this is following the guideline document of UN

Chair : any objection to adding the 2 § 10.9. and 10.10.?

NL : They are redundant, but they can be added.

Chair : we can discuss about the dates. Originally 2027 and 2028 were proposed for NT and AT respectively.

OICA : there are quite a few triggers. First are the tyres, if we request tyre manufacturers to have more accurate tyres, they need time to comply. Additionally for R155 we would need to modify the vehicle architecture for existing vehicles. Malfunction indicator is another trigger for additional lead time.

We are discussing about all vehicle categories, including trucks and busses, which have a longer development time and lifetime.

NL : maybe we can have a different transitional provision for malfunction indicator, later than 2027. We also have to look at the addition of 'any of'.

OICA : 'any of' is based on the guidelines of WP.29.

NL : In 10.7. we have to remove the 'any of', otherwise we would have to accept R39-00 series.

A recommendation I want to add a sentence 'if allowed by transitional provisions of other series'. In R137 there is an example :

12.3. Contracting Parties applying this Regulation shall continue to accept type-approvals of vehicles according to the preceding series of amendments, first issued before 1 September 2023, provided the transitional provisions in these respective previous series of amendments foresee this possibility.

Chair : can we remove 'any of' in 10.7?

OICA : can we have an internal discussion to check this in detail?

Chair : we can put square brackets around 'any of' in 10.7.

Sweden : I can't give a position at this time, we have to discuss further internally. We will have a position at GRSG regarding the dates for NT and AT.

France : 2nd date should be 2030 instead of 2033 in 10.7.

OICA : is there reason for risk to safety or environment? There is no justification we believe.

EU : it is a consumer issue (anti-tampering), and it is overdue that anti-tampering is tackled.

OICA : we understand the issue. However this regulation amendment will not solve this. The owner of the vehicle has unlimited access to their vehicle.

Consumer interest is not the issue of UN WP.29.

The hardware of the odometer has to be changed, software is next step. This has to be applied to new vehicles and also existing vehicles, but with only 1 year of time in between both.

Some of the GSR requirements were introduced in a rather short timeframe.

EU : we have Euro 7 requirements for anti-tampering, which we want to harmonize with UN requirements.

OICA : for new vehicle types, which are limited in number per OEM per year, it is more feasible to comply with new requirements as by this 02 series. However the existing vehicle types are a much bigger volume per OEM, and there is only 1 year extra to comply with the requirements.

Chair : the discussion will be continued in GRSG, since CPs need more time to discuss internally on what dates for NT and AT are acceptable.

France : maybe we can have proposal for split transitional provisions, with short dates for anti-tampering and more time for accuracy.

Chair : could this be an idea, similar to UN R48 and UN R16, to have separate transitional provisions for different requirements/paragraphs.

OICA : it increases complexity on the other hand for OEM and also for approval authorities.

We would prefer to have a wider gap between NT and AT dates. If that is not possible, then we could think about a split transitional provision.

Chair : agreement on the dates would of course be best. Only if not possible, then we could think about other ways.

For now conclusion : agree on square brackets around the dates, around 'any of' in 10.7.

OICA : which issue is the most important for CPs?

Chair : hard to say, anti-tampering is one thing, but accuracy is also related to national rules.

We can organize a meeting prior to GRSG, inviting more CPs to ask for input and eventually conclude in GRSG.

Chair : this concludes the points that were to be discussed.

EU : we had some additional points that we wanted to be checked by the group.

2.6. Definition of odometer : definition in Euro 7 is different

OICA : we think there is no conflict, however in the Euro 7 implementing regulations we would need to be careful what is referred to.

Chair : additional editorial changes :

2.5.1 and 2.5.2, shall mean => means

2.4. : 0.2 bar => 200 hPa

Chair : we will work on the informal document, the justifications, and we will prepare a draft document by early next week. Then there will be 1 week of revision period for all parties.

We will also book a meeting 1 or 2 weeks prior to GRSG with more CPs invited (2 hour session).

OICA : how about the speedometer display proposal by UK in § 5.1.?

Chair : it will be in the proposal, however no discussion in our task force took place. 5.2. will be a separate discussion in GRSG. This will also be reflected in the justifications.