Discussion paper – prohibition of the possibility of disabling the eCall system

According to European Standard EN 16072:2015 it is allowed to disable the eCall system. EN 16072:2015 paragraph 7.8.: 

"7.8 Modes of operation for automatic triggered eCall

The automatically triggered eCall may be set into one of two modes:
a) automatically enabled on vehicle ignition-on;
b) permanently disabled at the request of the vehicle owner by maintenance personnel and processes approved by the equipment supplier.

The normal mode of automatic operation shall be that the eCall system automatically enables an automatically triggered eCall on vehicle ignition-on."

Car owners, e.g. concerned about privacy, may choose this possibility.

This situation is also reflected by European Standard EN 16062:2015 paragraph 7.1.2.: 

“7.1.2 Enabled IVS

The following requirements apply to an IVS responsible for the eCall system that has not been disabled for reasons of privacy.

As specified in ....”

Because of this, and because of it not being specifically prohibited by the draft Regulation on AECS, we may expect vehicles for which the eCall system can be disabled or switched off. This by either permanent disablement via maintenance personnel or even just by switching off by a button or selecting this in a menu.

There had been similar discussions in the past with regard to the switching off of the ABS by the driver/rider.

If we agree this is an undesirable situation, the following amendments to Annex II and II are proposed:

Part II, Paragraph 16.1.2.:
16.1.2. The possibility to switch off or disable the AECD shall not be provided for.

Part III, Paragraph 26.1.2.:
26.1.2. The possibility to switch off or disable the AECS shall not be provided for.

(Any better wording reflecting this intention will be welcomed).