

Input from the NL to AECS-11

Dear colleagues,

As, unfortunately, I will not be able to participate in the AECS 11th meeting due to other activities, I would like to give some comments herewith by e-mail:

1. I can confirm that the OICA proposal with regard to the Annex 7 paragraph 3.2. test pulse of delta V max 70 km/h is acceptable, as well as a tolerance of just +0 km/h.
Also I can confirm that the 77 g is possible by the sled we have in use at the Technical Service in The Netherlands.
2. 7.4.1. 'AECD information and warning signal': basically OK but how about the situation when the data transmission failed and establishing voice communication is still in progress. Is that a situation which can occur and if so, how could/should that be signalled to the driver?
3. With regard to the power supply:
2.9. "back-up power supply": its OK but the approach of R116 paragraph 6.3.10. on Vehicle Alarm Systems (VAS) could also be considered. (Especially the phrase "*These batteries shall by no means supply energy to other parts of the vehicle electrical system*").

7.5.4. "... In the information document of Annex 4" should be "... In the Communication Form of Annex 1" (see Annex 1 item 9).
Annex 1 item 9 and 10 should be as follows:
(due to the situation of 7.6.2. when the component manufacturer wants to test and include a vehicle battery in the approval).
9. Brief description
AECD information and warning signal: yes/no.....
Hands-free audio equipment (micros and speakers) : yes/no
Back-up ~~battery~~ **power supply**: yes/no.....
Network access device antenna: yes/no
GNSS antenna: yes/no
GNSS receiver: yes/no
10. Component was tested according to the sled test of Annex 4 7 (components necessary for sending the MSD are by default tested to Annex 4 7 –TCU, back-up ~~battery~~ **power supply**, AECD information signal, GNSS antenna when internal to TCU, GNSS receiver when internal to the TCU):
AECD warning signal: yes/no.....
Hands-free audio equipment (micros and speakers) : yes/no
Power supply other than back-up battery: yes/no.....
GNSS antenna (when external to the TCU): yes/no
GNSS receiver (when external to the TCU) : yes/no

16.6.2.1. The absence of back-up power supply shall be clearly indicated in the information document of Annex 4 5
4. With regard to the discussion on the eCall off-switch/disablement function, I have no opinion whether it should be allowed or not. But like mentioned last meeting: if we do not regulate anything we may expect that systems will enter the market with this functionality. As the Regulation should not be conflicting with the EU legislation, The Netherlands will follow the

Commissions' decision with regard to this item. If the Commission cannot decide yet at this point (maybe due to EU privacy provisions) it may be considered to explicitly exclude the off-switch/disablement function from the scope of this Regulation.

*(Also consideration may be given to the reflection in Article 29 of the working party on data protection based on Opinion 15/2011. In the WP4 of the "Platform for the deployment of C-ITS in the EU" it has apparently been discussed to find a practical way to make sure that there **will be** a possibility to disable or switch-off the eCall system (even 'per key-on')).*

5. As I understood, within the EU it is the PSAP only which may disconnect the voice communication. So if a call is made, the vehicle occupant should not be able to 'hang up'. My question to the group would be if this is the case. If yes, should we regulate something within this Regulation not to be conflicting with the EU legislation (as we may expect that otherwise this functionality will be offered by manufacturers).
6. Previously I have mentioned the issue with regard to EMC. As mentioned at the time I believe that EMC is not sufficiently taken care of by just referring to R10. The reason is that the immunity provisions of R10 relate to the direct control of the vehicle where EMC for AECS concerns the functionality (sending data and establishing voice communication) of the system itself. So the direct control of the vehicle is not involved at all (as the vehicle is obviously crashed). I have until so far not received any comments and am interested if the participants believe EMC for AECS is sufficiently covered or not by R10.

Thank you in advance.

Have a good meeting and a nice stay in Korea!

Met vriendelijke groet / Kind regards

Tim Guiting

Senior Advisor General Safety
Vehicle Standards Development Department



Europaweg 205
Postbus 777
2700 AT Zoetermeer

M +31 6 2294 8002
T +31 79 345 8118
E tguiting@rdw.nl
I www.rdw.nl