Non-paper:

Proposal for integrating a component level approach into AECS/ACED (see also presentation)

3.1 "*AECD (Accident Emergency Call Device)"* means a unit or a set of units performing at least **one of** the following functions;

- receiving and/or generating the automatic and manual triggering signal**s,**
- receiving or determining the vehicle location,
- providing a warning signal
- sending the data, and
- allowing bidirectional audio signals for voice communication

Justification/explanation:

- in any case this definition needs to be changed because we already agreed that not all the functions are necessarily present on a device (e.g. warning signal, positioning) and may be checked at vehicle installation level under part II
- We can assume that a device can have various configurations
  - "One box" device that has all emergency call functions on board
  - "Semi-integrated" device that does not perform all the functions and makes use of other vehicle systems (audio, navigation, warning signal)
  - "individual" components that performs at least one emergency call related function
    - e.g. MNO antenna
    - e.g. power supply
    - e.g. control unit
- This assumption would allow suppliers that provide components for use in emergency call systems to perform the relevant test under their responsibility and offer these components as AECD approved devices to Manufacturers

Part I:

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6. Approval

6.1 If the samples submitted for approval meet the requirements of par. 7 that are relevant to available functions on the device, approval of the pertinent type of AECD shall be granted

The tests and verifications covered by this approval shall be clearly indicated in the communication document

7. General: sending MSD and voice connection
7.1 EMC
7.2 Position determination (& Annex 8)
7.3 Means of access to MNO
7.4 AECD information and warning signal
7.5 Power supply
7.6 Resistance to impact (& Annex 7)

Further explanation to this part I

Example 1:. If a power supply is presented for an approval as AECD:

- the applicable requirements should be at least resistance to impact with a functional check after the impact test (e.g. battery test)
- a power supply test still would have to be incorporated in the text as a post-sled test check
- Further power supply requirements (5-60-5) can be verified at vehicle installation level as foreseen in Par. 16.6.

Example 2: If a MNO antenna is presented for an approval as AECD the applicable requirement should be at least resistance to impact with a functional check after the impact test (e.g. VSWR measurement according to annex 9 par. xx).

Part II

15.1 …

Before granting approval for a vehicle type with regard to the installation of one or more AECD approved to Part I of this Regulation the competent authority shall ensure that the verifications not being part of one of the Part I approval**s** are included in the Part II approval. Unnecessary duplication of test and verifications shall be avoided