

Amendment:

"Annex 21, Appendix 2

#### 2.5.1

A simulation tool validation carried-out in accordance with Annex 21 appendix 2 and appendix 3, prior to the entry into force of Supplement [10] to the 11 series of amendments to this Regulation, may continue to be used for a new vehicle stability function approval or the extension of an existing vehicle stability function approval ~~without the need to produce a new validation test report as defined in Appendix 3~~ **provided that the relevant technical requirements are fulfilled. In this case, the necessity to produce a new validation test report as defined in Appendix shall be judged by Technical Service"**

Justification:

First of all, we already agreed to 1.2.2 of appendix 2 of annex 11 because makes transitional provision of R13 be not complex more. We can see that the paragraph 1.2.2. of Appendix 2 of Annex 11 describes a kind of effective usage of test report. This provision is only for test report.

In fact, the situation of simulation tool validation is slightly different from test report. The validation is similar to equipment-checking in advance of the approval test by technical service. A technical service can decide whether that tool is valid for R13 EVSC test or simulation every time. We can say this decision is the right of the technical service.

When the document includes the raw text of 2.5.1, it means that technical service has to agree to automatically carry over the test report without checking its validity.

From that point of view, the raw text of 2.5.1 is a kind of restriction for technical services. And from the experience of Japanese type approval testing for R13H ESC, the simulation validation has to be deeply discussed between the technical service and car manufacturer prior to its approval.

Therefore, to avoid automatically carrying over the test report without checking its validity, it should be amended as above based on the 08-11 document.