

Meeting Report (9th meeting)**Report on the ninth meeting of the GRRF Informal Working Group on Alternative Method Electronic Vehicle Stability Control (AMEVSC) held 12th July 2012.**

Venue: CLEPA Offices, 87 Boulevard Brand Whitlock; BE- 1200 Brussels, Belgium

Chairman: Dr. Michel LOCCUFIER (Belgium Ministry of Transport)

Secretariat: Mr. Paul JENNISON (CLEPA/Knorr-Bremse)

Participants: See document AMEVSC-09-02e

1. Chairman welcomed everyone to the meeting and noted the apologies for non-attendance from Mr. Crawley. He also expressed his thanks to Japanese delegation for participating in the morning session by telephone.
2. The draft agenda (document AMEVSC-09-01e) was adopted on the basis that item 5 was considered before item 4.

2 new documents were identified for consideration:

- Proposed amendment to Appendix 2 paragraph 2.5.1. from Japan for consideration under item 5 – allocated the number AMEVSC-09-03e
 - A proposal for a new paragraph 3.3.1. in the regulation from the VDA/MAN for consideration under item 4 – allocated the number AMEVSC-09-04e
3. The report of the eighth meeting (document AMEVSC-08-13e) was adopted without change.
 4. Using AMEVSC-08-11e – which was the resulting document from the 8th meeting – as a basis, the proposal from Japan (AMEVSC-09-03e) was discussed.

Japan explained that their concern was that the technical service carrying-out the braking system type-approval would have no choice other than to accept the use of a simulation tool with an old simulation tool validation report regardless of its suitability. It was pointed out that the use of the word “may” in the first sentence (“..... amendments to this Regulation, may continue to be used”) meant that there was no compulsion on the technical service to accept the validation report and that, therefore, the last sentence in the Japanese proposal was not necessary. To clarify the suitability of the simulation tool for a braking system type-approval with regard to Annex 21, the wording “the relevant technical requirements are fulfilled” was added. This would ensure that a simulation tool with an old validation test report could only be used if it met the requirements of the proposed amendment.

The resultant text is given in document AMEVSC-09-05e.

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No other changes were made and the secretary undertook to check the document AMEVSC-09-05e for consistency, add a justification and send it to GRRF as an informal document amending GRRF/2012/2 for consideration at the September 2012 GRRF.

The secretary also undertook to create a revision of GRRF/2012/2 which took into account the changes proposed in the informal document.

5. Paragraph 3.3. and the use of test reports

After a long discussion there remained widely differing views, with the consensus being that none of the proposals being considered provided a clear way forward in resolving these differences.

Therefore, it was agreed that no specific amendment proposal would be made to GRRF and the chairman would report on the various points that had been discussed with a view to GRRF deciding:

- Is there a problem that requires resolution?
 - Annex 21 specific, ECE R13 specific or '58 Agreement specific?

In the event of a yes decision, the recommendation would be the establishment of a new informal working group.

Discussion points:

- Before the introduction of test reports within the type-approval process it was appropriate that the Technical Service conducting the type approval was provided with a vehicle on which to conduct the tests as required by the regulation, hence paragraph 3.3. – “a vehicle, representative of the vehicle type to be approved, shall be submitted to the Technical Service conducting the approval tests.” With the addition of test reports within the type-approval process, and no change to paragraph 3.3. does this mean, for example, that:
 - a) the vehicle referred to in paragraph 3.3. and a vehicle in the test report shall be the same with regard to type, i.e. the same type from the same manufacturer, or
 - b) the vehicle referred to in paragraph 3.3. shall contain the same item that is the subject of the test report and the “approval tests” referred to in paragraph 3.3. are the tests to be carried-out at the time of type-approval for which there are no test reports.
- Should an Approval Authority only grant an approval when all the Technical Services providing test reports used in a braking system type-approval are designated by them for that specific work? Is there a difference in the case of a system type-approval and in the case of a vehicle type-approval?
- Is there a difference in responsibility when a Technical Service sub-contracts type-approval test work (with or without an Approval Authority approved test report) or when they receive an Approval Authority approved test report from another Technical Service that they then use in a type-approval? Is there a difference between a system type-approval and a vehicle type-approval?

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- Although it is only the vehicle manufacturer who can obtain a braking system type-approval and, as a result, it is the vehicle manufacturer who is responsible in the first instance for any resulting consequences, is it clear that this responsibility goes not go away when a provided test report is used in the type-approval?
- Is the need for the vehicle manufacturer to show satisfactory arrangements at the time of type-approval with regard to conformity of production, as required by paragraph 3.4., sufficient for the vehicle manufacturers to be aware of their responsibilities when using test reports?

6. **Next meeting:**

No further meetings are scheduled as they will be dependent upon the position taken by GRRF with regard to document GRRF/2012/2/rev1 and the general question on the use of test reports.
