2017, January 26th

**Submitted by the UTAC expert from France**

**Comments on document: “TF-EMC-04-02-(OICA)-R10.05\_Consolidated\_and\_amendments”**

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| **Reference** | **Paragraph** | **Comments** |
| **UTAC 1** | Scope | Scope of R10 (paragraph 1) should be updated with category T.  Whereas the Commission delegated regulation (EU) 2015/208 « supplementing Regulation (EU) No 167/2013 of the European Parliament and of the Council with regard to vehicle functional safety requirements for the approval of agricultural and forestry vehicles “ **Annex 15 part 9 refer to R10** |
| **UTAC 2** | 3.1.9 | Why have been deleted the paragraph 3.1.9. while the modification is not referred to the excel file TF-EMC-04-03-(OICA)\_R10\_Amendments.  We propose to kept this paragraph. |
| **UTAC 3** | 3.2.9 | This clause sates that "Components sold as aftermarket equipment and intended for the installation in motor vehicles need no type approval if they are not related to immunity related functions (see paragraph 2.12.). In this case a declaration shall be issued by the manufacturer that the ESA fulfils the requirements of this Regulation and in particular the limits defined in paragraphs 6.5., 6.6., 6.7., 6.8. and 6.9. of this Regulation."  **When** clause 6.10.3 states that "ESAs with no immunity related functions need not be tested for immunity to radiated disturbances and shall be deemed to comply with paragraph 6.8. and with Annex 9 to this Regulation."  **This seems inconsitent.** |
| **UTAC 4** | Annex 6 Clause 3.3.5 and 5.1.3 | **180** should be replaced by **180°** |
| **UTAC 5** | Annex 6, figure 4c, 4d, 4g, 4h | Figure 4c shall be updated because the plug shall be located in front |

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| **Reference** | **Paragraph** | **Comments** |
| **UTAC 6** | Annex 9 | Annex 9 appendix 4 figure : only one probe position is shown  Paragraph 4.3.2 of annex 9 states :  "The test shall be performed according to ISO 11452-4 on a test bench. As an alternative the ESA may be tested while installed in the vehicle according to ISO 11451-4 with the following characteristics:  (a) The injection probe shall be positioned in 150 mm distance to the ESA to be tested;  (b) The reference method shall be used to calculate injected currents from forward power;  (c) The frequency range of the method is limited by the injection probe specification."  In ISO 11452-4 there are two test methodologies :  a first one in closed loop method with injection probe at 900 mm from connector and a measuring probe at 50 mm from connector and a second one in substitution method with 3 positions(150 mm, 450 mm and 750 mm) of injection probe.  The figure and wording in ECE R1O annex 9 are not consistent with ISO 11452-4 : 2005 for the ESA test on the bench |
| **UTAC 7** | Annexes 11, 12,15 and 16 | Annexes 11, 12, 15 and 16 : there are some side views and not top views which are seems necessary because of the Z-folded cable not visible on side views.  Furthermore the figures are only for side plugs; figures are missing for front/rear plugs |
| **UTAC 8** | Annex 14, appendix 1, figures 1c, 1d, 2c, 2d | Proposal in figure 2a and 2c to **change the line** from box 11 to **a dash-line** as in figures 2b and 2d |
| **UTAC 9** | Annex 15 | Annex 15 Appendix 1 figure 1 should be modified with the 800 mm distance from vehicle side instead from the plug (for the left part) and from "CDN" side instead of cable (for the right part) |
| **UTAC 10** | Annex 16 | Annex 16 Appendix 1 figures 1 to 4 should be modified with the 800 mm distance from vehicle side instead from the plug (for the left part) and from "CDN" side instead of cable (for the right part) |

**Comments on excel file : “TF-EMC-04-03-(OICA)\_R10.05\_amendments”**

The UTAC expert is agreed with most of OICA propositions (**excepted** OICA 27 and 38 under discussion), China 1, China 2 and IMMA 1 introduced in excel file referenced TF-EMC-04-03-(OICA)\_R10.05\_amendments.