

Transmitted by the AMEVSC Chairman

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Report of GRRF Alternative Method Electronic Vehicle Stability Control (AMEVSC) Informal Working Group

As a result of the comments made at 72nd Session of GRRF with regard to the proposed supplement 10 to the 11 series of amendments to ECE Regulation 13 (document ECE/TRANS/WP.29/GRRF/2012/2) there has been a further 2 meetings of the AMEVSC informal working group. At these meetings the issues highlighted by GRRF have been discussed and the result is revision 1 of the document GRRF/2012/2.

In addition to clarifications and the consistent use of the wording “simulation tool” in place of the sometimes used word “simulator”, the main changes in revision 1 are:

- Made clearer that the simulation tool can only be used when the vehicle parameters of the vehicle to be type-approved are included in the simulation tool and the value of each parameter is within the validated range of the simulation tool (paragraph 1.3. of appendix 1).
- Division of the parameters listed in paragraph 1.1. of Appendix 2 into 2 subparagraphs. The first subparagraph 1.1.1. contains the vehicle parameters which do not have a numerical value but are important in understanding the capability of the simulation tool. The second subparagraph 1.1.2. contains the parameters that have a numerical value within simulation model. In both cases a “shall” is retained so that all listed parameters must be considered, with the footnote allowing a simulation tool to be used that does not include a parameter(s) on the basis that it limits the use of the simulation tool, e.g. a simulation tool that does not include gearbox type or gearbox characteristic parameters can be used for trailers, but not power driven vehicles (a “may” would mean that a simulation tool that did not include gearbox parameters could be used for power driven vehicles).
- New paragraph 2.5.1. added to appendix 2 to allow the continued use of a validated simulation tool, after the proposed amendment is adopted, provided that the relevant technical requirements are met and the scope of application is complied with.
- Contents of the simulation tool test report (appendix 3) brought inline with the changes made to paragraph 1.1. of appendix 2.

While it was possible to achieve a unanimous agreement on the changes included in revision 1, it was not possible to reach agreement on the general, or specific, use of test reports in the braking system type-approval process as provided for in various annexes to Regulation 13. There were widely differing views from the attending parties – from there is not a problem to there is a major problem – and none of the proposals considered was thought to provide a clear way forward.

Therefore, it is proposed that the issue regarding the ‘use of test reports in the type-approval process’ is separated from the ‘use and validation of the simulation tool’.

Should GRRF consider that there is an issue regarding the ‘use of test reports in the type-approval process’ that requires resolving at either an ECE Regulation 13 or 1958 Agreement level, it is suggested that a new informal working group is established. If it is found appropriate to establish such an informal working group, Belgium would be happy to provide a chairman and CLEPA the secretariat.

The main points for consideration are:

- The responsibility of the Technical Service issuing the type-approval test report which includes Approval Authority approved test reports from other technical services – is it clear or not clear?
- The responsibility assumed by the Approval Authority when signing a test report – the correctness of the content or only that the Technical Service is accredited?
- The obligation of an Approval Authority to accept a test report approved by another Approval Authority – is it dependant upon the Technical Service also being accredited by the second Approval Authority?

- The appropriateness today of the vehicle type definition or the requirement to provide a vehicle representative of the vehicle type for type-approval testing, for example paragraph 2.2. and paragraph 3.3. of Regulation 13 – do they need modification to cover ‘worst case testing’ (which occurs in practice) or the use of electronic subsystems, e.g. vehicle stability function, which are independent of the vehicle manufacturer identification logo on the vehicle?
- 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?
- The vehicle manufacturer is required to show satisfactory arrangements at the time of type-approval with regard to conformity of production, e.g. paragraph 3.4. of Regulation 13 – is this sufficient for the vehicle manufacturers to be aware of their responsibilities when using test reports?
