Dear Frank,

Please find below and attached the IMMA input on UN R10.

I would kindly ask you to present our input to the EMC TF tomorrow, since I doubt IMMA to be able to connect to the telco.

If the EMC TF agrees on them, thank you for incorporating our comments into R10.
If there are comments, please send them to me and I will consult our experts on them.

IMMA Comments (June 19, 2017)

1. Changes to **Section 6.3.2**, Vehicle narrowband type approval limits (and Appendix 4 and Appendix 5). The proposed changes aligns R10 with CISPR 12, which is the original source document for R10 radiated emissions. CISPR 12 is the base document representing the vehicle regulations for China and Canada radiated emissions. No concern. IMMA can support this alignment.

2. **Section 7.1.4**, Artificial Networks and Appendix 8
   a. USMMA’s understanding is that this is an attempt to harmonize with CISPR 25.
   b. Concern – USMMA believes there may be an error in Appendix 8: The revisions call out C2 as 1 μF default value. CISPR 25 calls out C2 as 0.1 μF. Recommend confirming that this change was intentional and make update the capacitance if this value was incorrectly specified.

2. **Section 7.19.1, Table 18**
   a. Aligns with ISO 7637-2, where pulse 4 is eliminated. IMMA can support.

3. **Annex 5**, deletes reference to quasi peak detector
   a. Quasi peak detector is not used for narrowband emissions – IMMA can support.

4. **Annex 6**, minor clarifications about state of vehicle
   a. USMMA can support.

5. **Annex 6, 5.1.3** – clarifies radiated immunity vehicle position when vehicle is rotated
   a. USMMA notes that motorcycles are typically (per my understanding) tested from the front only. IMMA can support

6. **Annex 6, Appendix 1** – Clarification of measurement points for electric vehicle charging mode testing in figures
   a. Minor clarifications. IMMA can support

7. **Annex 7, Section 4**
   a. Seems to eliminate an outdoor test site as an option – IMMA can support

8. **Annex 11**, EV test setup clarifications
   a. IMMA can support

   a. Minor, clarifications. IMMA can support

Attached you can find the following **updated figures**; see GRE-77-28 (April 2017 GRE): 
a. Annex 4, Fig 2b, pag 63 – figure, containing only the correct reference line
b. Annex 6, App1, Fig 2, pag 79 – updated figure, containing the text in the right position

Kind regards,
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