Unique Identifier (UI) Discussion document for SLR-20

Schedule 5		
3.	If the type approvals applicable to a wheeled vehicles, equipment or parts are stored on the secure internet database, then the approval markings required by UN Regulations may be replaced by a Unique Identifier (UI) preceded by the symbol UI, unless specified otherwise in the UN Regulations. Such unique identifier shall be generated by the database automatically.	

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ASSUMING THE FIRST CONDITION IS MET:

<u>The approval markings</u> required by UN Regulations <u>may be replaced</u> by a Unique Identifier (UI), <u>unless specified otherwise</u> in the UN Regulations.

Interpretation #1	In a UN Regulation it may be specified that <u>UI shall replace</u> existing "E markings", i.e. only UI allowed in that specific Regulation.	This option would solve the GRE problems: - lack of space for existing markings - handling of the markings in case of new series of amendments applying only to some devices (simplification of Regulations)
Interpretation #2	In a UN Regulation it may be specified that <u>UI shall NOT replace</u> existing "E markings", i.e. UI NOT allowed in that specific Regulation. → In this case, is it necessary to specify in the UN Regulation that no UI is allowed, or it is implicit?	This option would not solve the GRE problems. The current E-marking will remain the only option like today, i.e. lighting Regulations will never benefit of the DETA. In this case there would be no value in having DETA available
Interpretation #3	In a UN Regulation it may be specified that <u>UI MAY replace</u> existing "E markings", i.e. both existing "E markings" and UI allowed in that specific Regulation.	This option would be the worst case because it would increase the GRE problems. An optional use of the UI would mean that the existing E-marking would be an ongoing requirement, in addition to the UI that may still be requested by some CPs. In this case there would be no value in having DETA available

Question: who should decide if a specific UN Regulation may/shall/shall not use UI? The GRs (on the basis of the consensus among CPs), each individual CPs or industry?