DETA-17-03

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| Submitted by the informal group DETA | Informal document **WP.29-159-yy**(159th WP.29, session 12-15 March,  2013, agenda item 4.5) |

**Interim report of DETA**

**0. Summary: Decisions to be taken by WP.29**
The informal group DETA requests WP.29 to agree to the following approach:
1. The DETA application will be limited to a first step in which the type-approval authorities shall exchange the type approval documentation by using the DETA application where the individual UN-regulations requires so or may be exchanged via DETA where an individual UN regulation permits so.
2. Access to the data for this first step will be limited to the approval authorities, who will get writing and reading rights for all approvals, and to the manufacturers and those who are authorized by the manufactures to get reading rights for parts of or all the information for the relevant own approvals.
3. The data to be uploaded shall be that data as requested by the individual UN-regulation which mandates or require the use of DETA.
4. For the approvals as mentioned in the point above the approval marking may be replaced by the Unique Identifier that is generated automatically by the proposed DETA application where mandated by the a regulation.
5. The application will be the one as described in Annex 1
6. The DETA system shall be developed under the license of the European Type Approval Exchange System and on the server of that application without additional costs and once it is operational it shall be converted to the server of the UN as from 2015.
7. As from the conversion above in 2015 the UN organization will take care for the costs for the hardware, software, license, further maintenance inclusive costs for human resources.
8. As further development can be done under the umbrella of WP.29 there will be no need to create a steering board for the maintenance, further amendments and decision making for the DETA application.
9. The informal working group IWVTA will consider to incorporate the proposals from DETA as given in documents IWVTA-SG58-04-05 and IWVTA-SGR0-04-04 in the proposals for the revised 1958 Agreement and the draft Regulation 0 on IWVTA.

Further information can be found below.

**1. Introduction**
The Informal Working Group on the installation of a Database for the Exchange of Type Approval Documentation (DETA) has been established by WP.29 in it 142nd session. The frequency of the meetings of the informal group is three times a year. Since the first meeting on 16 November 2007 DETA met up to now 16 times, each time followed by an oral report to WP.29by the chairman.

The Terms of Reference as approved by WP.29 in its 146th session are given in document ECE/TRANS/WP.29/2008/117. The establishment of DETA would be an essential step to start consideration on the simplification of markings under the Regulations annexed to the 1958 Agreement. The present complicated marking of lighting devices can be simplified to a unique identifier (IU) provided that there is a database where further details of the device can be consulted.

In a later stage the International Whole Vehicle Type-Approval (IWVTA) would give further justification for the development of DETA.

**2. Questionnaire**
An inventory of the expectations by diverse possible future users of the system by means of a questionnaire (document DETA-05-03), of which the detailed results of the questionnaire are given in document DETA-05-04, showed that many parties are interested in the system like Contracting Parties, approval authorities, technical services, manufacturers, periodical inspection organizations, police, registration offices, consumers, etc. It also made clear that the view of “governmental organizations” and “Industry” on the system differ significantly.

2.1 *Objectives*
The objectives as seen by national authorities (including technical services) and manufacturers (including their associations) differ substantially. National authorities indicated in most cases the following aims:

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| Objective all | National authorities & technical services |
| Reference source of information  | 67% |
| Facilitate the approval process for vehicles & parts & components (for both manufacturers and technical services)  | 39% |
| Regulatory exchange of information facilitation  | 39% |
| PTI/roadside/used cars approval (reference values, technical data source, spare parts verification, vehicle modification identifying, vehicle features check)  | 33% |
| Approval validity check  | 28% |
| Vehicle registration/authorisation | 28% |

 while “industry” sees the following major aims:

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| Objective all | Manufacturer/industry/association |
| Simplify marking (interrogation of vehicle system approvals using only a single reference number)  | 57% |
| Reference source of information  | 29% |
| Possible future ECE-WVTA facilitation | 29% |
| Marking validity check  | 29% |

*2.2 Contribution to the database*
The enquiry also indicated that the national authorities might contribute more to the system than industry as follows:

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| Contribution | National authorities & technical services | Manufacturer/industry/association |
| Retrieval  | 56% | 29% |
| Submitting | 50% | 14% |
| None  | 0% | 29% |

2.3 *Preferred data type*
The position of authorities and industry on the need for including specific data differs. The data that was indicated most times are:

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| Data type  | National authorities & technical services | Manufacturer/industry/association |
| Communication form  | 61% | 43% |
| Information document  | 61% | 14% |
| Test report  | 61% | 0% |
| Annexes to the communication form  | 56% | 14% |
| Pictures &drawings | 33% | 14% |
| All the data necessary | 22% | 43% |

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*2.4 Ownership of the data*
The views on who is the owner of the information stored in the DETA system differs as well:

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| Who is the owner of the UN ECE TA data (with regard to your domestic law)?  | National authorities & technical services | Manufacturer/industry/association |
| National authority only | 39% | 14%  |
| Applicant/manufacturer/representative only | 28% | 43%  |
| TAA &applicant (specific data)  | 11% | 0%  |
| Applicant& TAA & TS  | 6% | 0%  |
| TAA & TS only | 6% | 0%  |
| Public property (although restricted publication)  | 6% | 0%  |

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*2.5 Restriction of access*
Most of the responders indicated that there should be a method available to restrict and control the reading access. Having regarded the confidentiality of the data stored in the database and the access to it by the users a multilayer approach might be necessary where certain groups of users might or might not to see all information.

*2.6 Other system features*
Especially industry indicated the need for the following additional features of the system:

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| Other important system features  | National authorities&technical services | Manufacturer/industry/association |
| Notification/communication system for new input.  | 6% | 29% |
| Rapid access for the authorized agencies (if simplified marking)  | 0% | 29% |
| Security  | 6% | 29% |
| Multilanguage interface  | 0% | 14% |
| Standard software requirements | 6% | 0% |
| Keeping historical approvals | 6% | 0% |

*2.7 Financing*
The view of both national authorities (56%) and industry (29%) is that the system should be financed by the users, where for the national authorities 29% supports a flat fee for all users.

*2.8 Further applications*
There is no need that DETA seeks for further system applications like integration with global databases, inclusion of EC type-approvals or ITS data information progress.

*2.9 Outsourcing of responsibilities*
There is no support for outsourcing responsibilities on the field of general policies, development strategy and legal assessment. Support for outsourcing of system maintenance, administration, distribution and technical support can be accepted by the majority of all responders.

The results of the questionnaire can be summarized that the governmental organizations are focusing on the administrative side of the type approval process including the electronic exchange of a wide range of information. Industry is more reserved which might be related to the ownership and confidentiality of and the access to the information and is focusing of the simplification of complicated type approval marking via a unique number or Unique Identifier (UI) and the development of an International Whole Vehicle Type-approval (IWVTA) within the UN-ECE. The informal group discussed a step by step approach, where the approval authorities will upload only those documents as requested by the Regulation to be circulated between the approval authorities. In the first step the access to the data will be limited to the approval authorities or to those parties as authorized by the manufacture. On a voluntary basis more information related to the type-approval may be uploaded as well. Such a first step would take into account the common aims of industry and government as expressed in the questionnaire.

The informal group discussed several times how the financing of the system should be divided fairly over the users; a rate for all users, for every upload or every download? Directly related to a mandatory fee for the participants of the DETA-system was the need for a steering board for making decisions on operational items, under which the financing of all costs. With the offer of the IT section of UNECE to facilitate the system once it is operational (inclusive the costs for the staff at UNECE, the hardware, the license fee for the software, and maintenance costs) these problems of the financing and steering board are resolved. Further development of the system can from that moment be done directly by WP.29.

**3. European Type Approval Exchange System (ETAES) and Hosting**
The informal group noted several demonstrations of the European Type-Approval Exchange System from the European Union (EU) in which all whole vehicle type-approval certificates and their attachments are uploaded to a centralized server in one of its Member States. All uploaded documents are accessible for all approval authorities of the EU. The DETA informal group concluded that this application fulfills all the needs as expressed by the participants of the informal group, inclusive the automatic generation of the Unique Identifier as possible replacement of approval markings and the rights for access to the information. The informal group proposes to use the same platform for the DETA application as is used for ETAES.
In the 15th meeting of the IG-DETA the UNECE IT-division/secretariat announced the possibility to host the server application from 2015 onwards after the critical and time consuming period of 2 years introduction is passed. In that case the German approval authority, who is the host of the ETAES server and application, offered to develop the DETA system under the ETAES license, thus closing the financial gap until the IT division of UNECE will take over the hosting of the system. So the question of financing the system can be handled. WP.29 is requested to approve this approach.
A description and manual of the used application is annexed (Annex 1) to this report.

**4. Implementation of the DETA system in the text of the 1958 Agreement and the IWVTA.**
The informal group is of the opinion that there should be a legal basis for the application of the DETA-system to permit the electronic distribution of type approval documentation and the use of the Unique Identifier as alternative to complicated approval markings. Document IWVTA-SG58-04-05( see Annex 2) is the proposal of the IG-DETA in which it proposes:
- to include the use of the UI in article 2 of the text of the 1958 Agreement that is under revision as an alternative for the present approval marking ,
- to include the possibility to apply the electronic distribution of type approval document and
- to include in an Appendix to the 1958 Agreement further details.
The details for the appendix will include:
- the establishment of a secure internet database by the Executive Secretary of UN-ECE,
- the mandatory circulation by means of that system if requested by that regulation, especially Regulation 0 for the IWVTA,
- the inclusion of the Communication form and
- the optional use of the UI for those approvals where the relevant Regulation permits so provided that the approval is stored in the DETA database.

The informal group DETA proposes to WP.29 to agree to the view of IG-DETA that for a smooth use of the IWVTA scheme for whole vehicle type approvals and the registration of vehicles that the DETA system should be used on a mandatory basis for Regulation 0 on the IWVTA (see document IWVTA-SGR0-04-05, that mandates the use of DETA for the distribution of the Communication forms for all IWVTA granted according Regulation 0. (proposal for SGR0 annexed as Annex 3 to this report)

 The informal group DETA supports the view that beside the need of the simplification of the approval marking also the fast distribution of IWVTA a basic reason for the development of DETA is. To be able to use such approvals for national or regional whole vehicle type approvals as soon as possible a mandatory use of the DETA system is necessary. Document IWVTA-SGR0-04-05 reflects this proposal for the use of DETA for the distribution of the Communication forms for all IWVTA granted according Regulation 0. Watching the time line of the introduction of the IWVTA, DETA need to be settled in 2015. Therefore an introduction phase of at least two years before seems to be necessary.

WP.29 is urgently requested to adopt the principles of these two proposals from the informal group DETA such that the informal group IWVTA can incorporate these in their preparation of the revised text of the 1958 Agreement and the draft text for Regulation 0.

**5. Further development**
- Further development of the DETA application
- Until an official decision by WP29 - put IG-DETA in an idle position

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Frank Wrobel

4 February 2013

Annex 1

(Description and manual of the system)

(text to be added)

Annex 2**(Implementation of the DETA system in the text of the 1958 Agreement and the IWVTA.)**

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| Transmitted by the secretariat of the WP.29 informal group on DETA | Document No. IWVTA-SG58-04-05 |

**DRAFTING PROPOSALS FOR THE REVISED 1958 AGREEMENT FOR THE USE OF DETA IN THE 1958 AGREEMENT**

In its 16th session the informal group DETA of WP.29 discussed the required amendments for incorporating a basis for the use of DETA in the revised 1958 Agreement on the basis of document DETA-16-04. The informal group concluded on some amendments which are reflected in document DETA-16-04-Rev.1e. After expiration of the period for final comments the latter document can be seen as the final proposal for input to the SG58. The SG58 is requested to incorporate the proposals below, being the text from DETA-16-04-Rev.1e, in the draft text for the revised 1958 Agreement.

**Proposals**
Amend articles 2 and 5 and insert a new appendix [X] as follows:

Article 2

Each Contracting Party applying Regulations largely through type approval shall grant the type approvals and approval markings described in any Regulation for the types of wheeled vehicles, equipment or parts covered by the Regulation, provided that it has the technical competence and is satisfied with the arrangements for ensuring conformity of the product with the approved type as set out in Appendix 2. Each Contracting Party applying a Regulation through type approval shall refuse the type approvals and approval markings covered by the Regulation if the above-mentioned conditions are not complied with. **Regulations may permit the type approval markings to be replaced by a Unique Identifier (UI) in accordance with Appendix [X].**

Article 5

The competent authorities of each Contracting Party applying Regulations through type approval shall send monthly to the competent authorities of the other Contracting Parties a list of the wheeled vehicle, equipment or parts, approvals of which it has refused to grant or has withdrawn during that month; in addition, on receiving a request from the competent authority of another Contracting Party applying a Regulation through type approval, it shall send forthwith to that competent authority a copy of all relevant information on which it based its decision to grant, refuse to grant, or to withdraw an approval of a wheeled vehicle, equipment or parts to that Regulation. **The paper copy may be replaced by an electronic file in accordance with Appendix [X].**

**Appendix [X] (The Placeholder)**

**Where an Approval Authority is required to or is requested to provide a copy of an approval and its attachments it may send the documents as paper copies or in electronic form. The Executive Secretary of the United Nations Economic Commission for Europe may establish a secure internet database to store and facilitate circulation of electronic copies of approvals. Regulations annexed to this Agreement may require the circulation of electronic copies where necessary for the efficient operation of the approval process, subject to the access rights as defined by the Contracting Parties.**

**Documents stored on a secure internet database should consist of at least the documents specified in each Regulation for the purpose of communicating to Contracting Parties notice of approval or of extension or refusal or withdrawal of approval or production definitely discontinued of a type of device pursuant to the Regulation.**

**If the approvals applicable to a device are stored on a secure internet database established by the Executive Secretary of the United Nations Economic Commission for Europe then the approval markings required by Regulations for that device may be replaced by a Unique Identifier (UI) that is generated by the database, where this is permitted by the Regulations. The database will supply information on the approvals applicable to the device by reference to the UI.**

**Justification**

It is common practice for Approval Authorities to store approval documents electronically and, if a copy of an approval is requested, it is usual to send an electronic copy by email. With the development of a whole vehicle approval process under the 1958 Agreement (IWVTA) the timely circulation of IWVTA approval documents will be crucial to ensure prompt acceptance of vehicles for registration in Contracting Parties that recognise IWVTA. A database of whole vehicle approvals is established in the EU and a similar UN database would offer significant efficiencies in circulating IWVTAs between Contracting Party Approval Authorities. The DETA Group has developed the concept for such a database.

A simple provision to allow circulation of electronic copies is added to Article 5. Detailed provisions, including the possibility of a database, will sit better in Appendix X (the Placeholder) rather than in the Articles.

The DETA group has developed the concept of the Unique Identifier (UI) in order to offer the possibility of simplifying the current approval marking requirements, particularly on lamps. Instead of the current complex markings the UI will be marked on the device and will give access to the copies of the approvals for the device that are stored on the database. The UI can be generated automatically by the database. Provision for the use of the UI is added to Article 2.

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Annex 3

**(DRAFTING PROPOSALS FOR THE DEVELOPMENT OF UN REGULATION 0 FOR THE USE OF DETA)**

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| Transmitted by the secretariat of the WP.29 informal group on DETA | Document No. IWVTA-SGR0-04-05 |

**DRAFTING PROPOSALS FOR THE DEVELOPMENT OF UN REGULATION 0**

**FOR THE USE OF DETA**

In its 16th session the informal group DETA of WP.29 discussed the required amendments for incorporating a basis for the use of DETA in the revised 1958 Agreement and for incorporating the use of DETA in Regulation 0. The informal group agreed to forward its proposal for the draft regulation 0 as given in document DETA-15-03-Rev.1e to the SGR0. The SGR0 is requested to incorporate the proposals below, taken from DETA-15-03-Rev.1e, in the draft text for Regulation 0. The proposed amendments are based on Document [IWVTA-09-09](http://www.unece.org/fileadmin/DAM/trans/doc/2012/wp29/IWVTA-09-08e.doc) that contains the first proposal from OICA for a UN Regulation 0 on the International Whole Vehicle Type approval.

**Proposal**

Amend paragraph 4 as follows:

## 4 Approval

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| 4.1 | If the vehicle type submitted for approval pursuant to this Regulation meets the requirements of the Regulation, approval of that vehicle type shall be granted. |
| 4.2 | An approval number shall be assigned to each type approved. Its first two digits (at present 00 for the Regulation in its original form) shall indicate the series of amendments incorporating the most recent major technical amendments made to the Regulation at the time of issue of the approval. The same Contracting Party shall not assign this number to another vehicle type. |
| 4.3 | Notice of approval or of extension or refusal of approval or production definitely discontinued of a vehicle type pursuant to this Regulation shall be communicated**,** **by means of a secure internet database in accordance with Appendix [X] to the 1958 Agreement,** to the Parties to the 1958 Agreement applying this Regulation, ~~by~~ ~~means of~~ **using** a form conforming to the model in Annex 1 to this Regulation. |
| 4.4 | An international approval mark shall be affixed, conspicuously and in a readily accessible place specified on the approval form, to every vehicle conforming to a vehicle type approved under this Regulation. Such international approval mark shall consist of: |
| 4.4.1 | A circle surrounding the letter “E” followed by the distinguishing number of the country which has granted approval[[1]](#footnote-1); |
| 4.4.2 | The number of this Regulation, followed by the letter “R”, a dash and the approval number to the right of the circle prescribed in paragraph 4.4.1. |
| 4.5 | If the vehicle conforms to a vehicle type approved according to this regulation, no approval marks with regard to approvals granted for the regulations listed in annex 4 need to be affixed to the vehicle.  |
| 4.6 | The approval mark shall be clearly legible and be indelible. |
| 4.7 | The approval mark shall be placed close to or on the vehicle data plate affixed by the manufacturer. |
| 4.8 | Annex 2 to this Regulation gives an example of the arrangement of the approval mark. |

**Justification**

It is common practice for Approval Authorities to store approval documents electronically and, if a copy of an approval is requested, it is usual to send an electronic copy by email. With the development of a whole vehicle approval process under the 1958 Agreement (IWVTA) the timely circulation of IWVTA approval documents will be crucial to ensure prompt acceptance of vehicles for registration in Contracting Parties that recognize IWVTA. A database of whole vehicle approvals is established in the EU and a similar UN database would offer significant efficiencies in circulating IWVTAs between Contracting Party Approval Authorities. The DETA Group has developed the concept for such a database and has proposed amendments to create the possibility of using DETA in the draft text for a revised 1958 Agreement.

This amendment aims to mandate the use of DETA for circulation of IWVTA’s.

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1. see annex 3 of Document ECE/TRANS/WP.29/78/Rev.2 [↑](#footnote-ref-1)