**IMMA comments on**OBD2CG-03-05 OBD2 overview updated 20180807.xlsx

**Note**

* This paper contains comments on top of the one already submitted by IMMA in OBD2CG-03-03 IMMA Comments on Draft OBD2 GTR 2018-07-10.xlsx
* It refers to the latest overview: OBD2CG-03-05 OBD2 overview updated 20180807.xlsx

**Comments**

* §5.3.12.2. of general requirements:

For CLEPA proposal, No Position.
The OBD system shall record fault code(s) indicating the status of the emission control system or of the functional safety system leading to an operation mode with significantly reduced torque in comparison to normal operation mode. Separate status codes shall be used to identify correctly functioning emission control systems, functional safety systems and those emission control systems which need further vehicle operation to be fully evaluated. If the MI is activated due to deterioration or malfunction ~~or permanent emission default modes of operation~~, a fault code shall be stored that identifies the type of malfunction. A fault code shall also be stored in the cases referred to in points 5.3.7. and 5.3.8. ~~3.3.5. and 3.3.6.~~Justification: definition of malfunction already includes permanent emission default modes. IMMA propose to delete. If permanent emission default mode is left in this text, definition is needed. (definition need to be copied from EURO5)

* § 5.5.2. of general requirements:

IMMA understands that it is appropriate to include OBD thresholds in GTR
IMMA requests to modify text as follows:
Contracting parties shall introduce OBD threshold 2 after the introduction of OBD threshold 1. Contracting parties shall set appropriate period for OBD threshold 1 before introducing OBD threshold 2.
Also, in the technical report of grt, IMMA proposes to include following text.
CAT monitoring is recommended to be introduced at the same time when OBD threshold 2 is introduced.
With regard to appropriate period for OBD threshold 1, 4 years are recommended. In order to make vehicles to suit to the local environment and to firmly comply with OBD threshold 2, it is important to set appropriate period to allow manufactures to conduct field study and develop their vehicles based on the information acquired by the field study.

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