Submitted by the experts from Japan

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Proposal to amendment the document ECE/TRANS/WP.29/GRE/2018/43 submitted by the Task Force on Electromagnetic Compatibility (TF EMC)

Note: This paper proposes the Japan stance based on discussion result in the Japan GRE EMC T/F in JASIC (JAPAN MLIT, NTSEL, JAPIA, JAMMA*, JAMA).
The text reproduced below was prepared by the Task Force on Electromagnetic Compatibility (TF EMC) with the aim to propose a new series 06 of amendment to UN Regulation No. 10. The modifications to the existing text of UN Regulation No. 10 are marked in bold for new or strikethrough for deleted characters. Some text is shown in square brackets to indicate that discussion and a decision are required.
The text with red characters below is added proposals from the Japan.

I. Proposal

Paragraph 1.1., amend to read:

"1.1. Vehicles of categories L, M, N ~~[~~and~~]~~ O~~, [T, R and S]~~[1] with regard to electromagnetic compatibility;"

~~[1] As defined in the Consolidated Resolution on the Construction of Vehicles (R.E.3), document ECE/TRANS/WP.29/78/Rev.3 6, para. 2.~~

Paragraph 3.1.8., amend to read:

"3.1.8. For vehicles of categories ~~[L],~~ M, N ~~[~~and~~]~~ O~~, [T, R and S],~~ the vehicle manufacturer shall provide a statement of frequency bands, power levels, antenna positions and installation provisions for the installation of radio frequency transmitters (RF-transmitters), even if the vehicle is not equipped with an RF transmitter at time of type approval. This should cover all mobile radio services normally used in vehicles. This information shall be made publicly available following the type approval."

Annex 6, paragraph 3.2., amend to read:

"3.2. For categories M, N~~,~~ and O~~, [T, R and S]~~ vehicles according to ISO 11451-2."

* JAMMA: Japan Agricultural Machinery Manufacturers Association

II. Justification

1. T, R & S agricultural vehicles are different use cases and different specification among Nations and countries. Especially between EUs and Asian Nations, there much differences in vehicle regulations and its requirements according to their use case.
2. UN R10 is uniform provision between contracting parties which applied R10. Concerning the T, R and S, they are not adequate to apply R10 requirements in some contracting parties. At least Japan will not adapt R10 on T, R and S in domestic regulations based on discussion all related organizations in Japan.
3. Japan will not support to add the T, R and S in the scope of R10. If some contracting parties think an EMC regulation for T, R and S is needed, Japan thinks we should consider developing new UN regulation for T, R and S instead of adding the T, R and S in the scope of R10.
4. Addition of T, R and S can be obstacle to extend the applicable contracting parties.

5. There is not any standard RF-transmitter test method for L category vehicles. Transceiver immunity test method is defined in ISO 11451-3. ISO11451-3 focuses only on M and N vehicles.
6. For M and N, there would be cases to install radio transceiver for business and private use, but it would not be common for L category. In addition to that, the installation space is very limited, and in general, it is very hard to use it when the PTW is running. The radio transceiver certificates requirements should not be applied for PTW.