Responsibility for uploading the DoC information on DETA. Vehicle manufacturer or approval authority?

1958 Agreement:
Schedule 5 Circulation of approval documentation
1. Where an approval authority is required to or is requested to provide a copy of an approval and its attachments, it shall send the documents as paper copies, or by e-mail in electronic format, or by utilizing the secure internet database established by the United Nations Economic Commission for Europe.

UN/ECE R0:
5. Specifications
5.2. Declaration of Conformance (DoC)
5.2.1. If a Contracting Party requires so the vehicle manufacturer shall provide and upload on the UN secure internet database for all single vehicles intended to be placed on the market in that Contracting Party and belonging to a type approved according to this Regulation the necessary information to generate within that database a DoC for the vehicles concerned. The process and necessary information are set out in Annex 6.
5.2.2. Notwithstanding paragraph 5.2.1. above the vehicle manufacturer can also provide and upload the information required for all single vehicles covered by an IWVTA regardless of their destination.
5.2.3. The information referred to in paragraph 5.2.1. above shall be uploaded in due time for the placing on the market of the vehicles in the Contracting Parties.
5.2.4. The information referred to in paragraph 5.2.1. above may also be uploaded by the approval authority on behalf of the manufacturer. In this case, it is the responsibility of the manufacturer to provide the approval authority with the necessary information and remain accountable for its accuracy.

Annex 6 Specifications of the IWVTA Declaration of Conformance (DoC)
2. Description of the DoC-Process
2.2. The manufacturer shall provide and upload into the UN secure internet database for each single vehicle produced in conformance with an IWVTA:
2.2.1. The information for the identification of a single vehicle (normally the VIN);
2.2.2. The type approval number of the IWVTA which covers this vehicle.
2.3. By providing the information specified in paragraph 2.2. of this annex, the manufacturer states that the vehicle conforms to the specified IWVTA.

Annex 6 - Appendix 1 Declaration form for the IWVTA Declaration of Conformance for vehicles of category M1
The manufacturer hereby certifies that …
Check of correspondence between data in DETA and the DoC.

The DoC information consists of the 7 data fields of Annex 6 Appendix 1 and the list of UN Regulations and series of amendments in the Conformance list of Appendix 2. This data cannot be generated automatically from the data that is available in DETA (it is not an attribute (e.g. "0.2. IWVTA class") or may differ from the entry in the corresponding attribute (e.g. "0.5. Name of manufacturer")). This also applies to the data on the Conformance list. Therefore it will not be possible to check automatically the correspondence between the DoC data delivered by the manufacturer and the data that is already available in DETA.

When uploading a set of DoC’s by the manufacturer, the system will only check whether the approval number from the DoC data conforms to the entry in the corresponding attribute in DETA.

Is this sufficient (taking into account the constraints of the data model)?
Correction suggested with regard to “query”.

UN/ECE R0:
Annex 6 Specifications of the IWVTA Declaration of Conformance (DoC)
2. Description of the DoC-Process
2.4. The UN secure internet database allows for a query from any authorized party to generate a DoC for a single vehicle based on the type approval number that is linked to that single vehicle as specified in paragraph 2.2. of this annex.

The Conformance list (Annex 6 Appendix 2) is unique for each type approval number and can be viewed by a query based on the type approval number. But as the DoC is for a single vehicle and because the VIN need to be shown on the DoC form (Annex 6 Appendix 1 item 0.10.) the VIN need to be entered for each DoC.

The current text indicating:
“a query … based on the type approval number”, need to be amended to:
“a query … based on the VIN and the type approval number”.

Issues forwarded by the Jan. 2019 ‘DoC Drafting Group’ session to IWVTA IWG
Issues forwarded by the Jan. 2019 ‘DoC Drafting Group’ session to IWVTA IWG

Editorial corrections suggested for DoC model - 1.

UN/ECE R0:
Annex 6 - Appendix 1 Declaration form for the IWVTA Declaration of Conformance for vehicles of category M1

The manufacturer hereby certifies that the vehicles:
0.2. IWVTA class:
0.2.0. IWVTA type:
0.4. Vehicle category:
0.5. Name of manufacturer:
0.10. Vehicle Identification Number:

conforms in all respects to the type described in approval ………………. issued on ………………. and that this IWVTA type is approved according to the UN Regulations as listed in this document.

The detailed information about the manufacturer may be obtained from the type approval authority.

R0 currently applies to M1 only.
In case of future amendment of R0 for other categories, the category is indicated in item 0.4. anyway. Therefore the reference to M1 in the heading is superfluous.

DoC means the information for a single vehicle (a single VIN). Therefore “vehicles” shall be singular “vehicle”.


Issues forwarded by the Jan. 2019 ‘DoC Drafting Group’ session to IWVTA IWG

Editorial corrections suggested for DoC model - 2.

Does the sequence number of the first column of the Annex 4 table relates to the UN Regulation number of the third column? If there is no link, the first column of the Annex 6 Appendix 2 Conformance list may be deleted.

Annex 4

List of requirements for the purpose of IWVTA

<table>
<thead>
<tr>
<th>Number</th>
<th>Topic</th>
<th>Version of UN Regulation</th>
<th>UN Regulation</th>
<th>Series of amendments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Retro-reflecting devices for power-driven vehicles and their trailers</td>
<td>3</td>
<td>02</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Devices for the illumination of rear registration plates of power-driven vehicles and their trailers</td>
<td>4</td>
<td>00</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Direction indicators for power-driven vehicles and their trailers</td>
<td>6</td>
<td>01</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Front and rear position lamps, stop-lamps and end-outline marker lamps for motor vehicles and their trailers</td>
<td>7</td>
<td>02</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Vehicles with regard to electromagnetic compatibility</td>
<td>10</td>
<td>05</td>
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</table>

Annex 6 - Appendix 2

Conformance list

<table>
<thead>
<tr>
<th>Number</th>
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<th>Series of amendment No.</th>
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</table>
Issues forwarded by the Jan. 2019 ‘DoC Drafting Group’ session to IWG on DETA and IWVTA IWG

Other issues:

- UN/ECE R0 Annex 6 Appendix 3 translation sheets:
  should DETA provide for a web link to the UN/ECE webpage where the translation sheets are stored (same webpage as for the DETA user manual, etc.).

- Enlarging the IWG on DETA mandate:
  necessary due to a possible future inclusion of software ID’s (RxSWIN’s) in DETA.

- Legal basis for inclusion of RxSWIN’s:
  a legal basis need to be established within the framework of the 1958 Agreement (e.g. in a Schedule to the Agreement).

- Access rights to DETA / DoC:
  a decision by WP.29 is required on who will get rights to what kind of information (attributes, DoC, various document parts) in DETA.
Issues forwarded by the Feb. 2019 ‘Group Of Interested Experts on UI’ meeting to IWG on DETA and IWVTA IWG

- Endorsement by the IWVTA IWG is requested for the updated ‘Draft Guidelines for application of the Unique Identifier (UI)’ (doc. DETA-34-10e).

- A new Q&A, or amendment to an existing Q&A, is required to clarify the use of the Unique Identifier. Especially in case where a UI marking will replace the E marking on existing products, clarification is required.

- As some CP’s and non-CP’s require specific E marking, a clarification for these CP’s and non-CP’s is necessary to explain that the UI marking can be regarded as equivalent. It is requested to have a statement to this end on the UN/ECE webpage (same webpage as for the DETA user manual, etc).

- In case where two or more type approval numbers are combined for one product, in order to have one UI marking for that product, DETA shall automatically check that this had not already been done for the same product. So the DETA system shall ensure that the same type approval numbers are not already combined for the same product. One and the same product shall have only one UI.

When an approval authority combines more approval numbers for one combined product, DETA shall also automatically check that only approval numbers from the same manufacturer (approval holder) are combined.