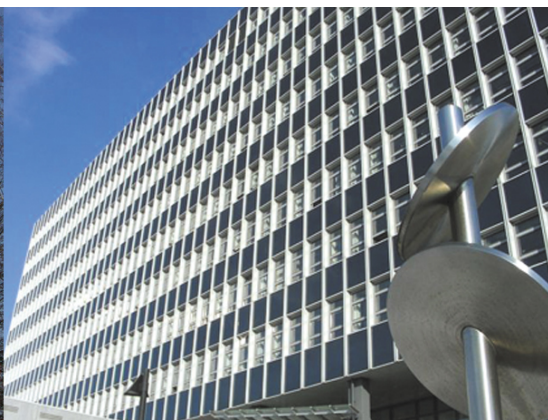


**Kraftfahrt-
Bundesamt**



Experiences during the test phase with the draft regulations CS & SUP



Type-approval / Market surveillance

Experiences Cyber Security

- Definitions of Development phase, Production phase and Post-production phase is needed
 - Specific individual vehicle or vehicle type (usage of the EE Architecture or IVWTA)
 - What is included in the Post-production phase (e.g. scrapping of the single components)
- Definition „vehicle type“ and „systems“ unclear – shall be specified (e.g. EE Architecture)
- Definition of full supply chain is need or use of reasonable supply chain instead of full supply chain
- Definition of threats is needed to define against which threats the vehicle shall be protected
- Definition of risk treatment and using of risk treatment instead of protection and mitigation

Type-approval / Market surveillance

Experiences Cyber Security

- Aim of the assessment of the management system and the vehicle type shall be describe
- Requirements on the vehicle type and the management systems are partly redundant
 - If the management system and the vehicle type is verified by different institutions, a close cooperation between the institutions is necessary
- Quality criteria for the documentation (e.g. risk assessment) and tests of the manufacturers may be needed
 - E.g. according to an ISO xxxxx as a possibility
 - How much risks can be accepted (which criticality)?
- How to handle the requirements of the draft Regulation in the first years of application, where vehicles with existing long term architectures are not developed in line with the required processes?

Type-approval / Market surveillance

Experiences Software Update Processes

- Definition „vehicle type“ and „system“ unclear – shall be specified
- Usage of „system“ shall be reviewed
- Scope of Annex A may be modified - vehicles intended for software updates
- Aim of the assessment of the management system and the vehicle type shall be describe
- Requirements on the vehicle type and the management systems are partly redundant
 - If the management system and the vehicle type is verified by different institutions, a close cooperation between the institutions is necessary
- Define a precise requirement in which time frame the manufacturer shall provide necessary documentation to the authorities and how long the documentation shall be stored at the manufacturer

Type-approval / Market surveillance

General remarks

- Necessary information from the interpretation document shall be included in the Regulations
 - Interpretation document may be deleted afterwards
- Test cannot be finished – Information document and test report could not be proved/ evaluated
 - Will be finished until the end of August

Legal notice

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 We score with road safety!