

2 Definitions

	draft	comment
2.33	Side air bag means any inflatable occupant restraint device that is mounted to the seat or side structure of the vehicle interior, and that is designed to deploy in a side impact crash to help mitigate occupant injury and/or ejection.	Delete “in a side impact crash” The type of crash should not be specified, because in some cases, (e.g. oblique impact) side airbag may deploy to reduce injury risk.
2.34	Side curtain/tube air bag means any inflatable occupant restraint device that is mounted to the side structure of the vehicle interior, and that is designed to deploy in a side impact crash or rollover and to help mitigate occupant injury and/or ejection.	Delete “in a side impact crash or rollover and” Considering the control extensibility of occupant protection devices, the type of crash should not be specified. In some cases, the device can activate even in a frontal collision.
2.37	ESC activity means the Electronic Stability Control system is actively controlling the vehicle’s brake and/or throttle.	Some vehicles do not have Throttle control. (ex; Diesel) Change the word from throttle to engine torque.
2.40	AECS means any device that complies with UN ECE R144, “Accident Emergency Call System (AECS)”.	This definition is not necessary. This word is not used in this document.

3 Application for approval

	draft	Comment
3.3	A description of the vehicle type with regard to the items mentioned in paragraph 2 above. The numbers and/or symbols identifying the engine type and the vehicle type shall be specified;	<ul style="list-style-type: none"> Modified to 3.2.1 because it is a chapter accompanying 3.2 Delete “Engine type” because it is not related to EDR specification. Some OEM apply the same EDR system to both conventional and Hybrid Vehicle.
3.4	A list of the components ECU recording data as EDR function, duly identified, constituting the EDR;	<ul style="list-style-type: none"> Modified to 3.2.2 because it is a chapter accompanying 3.2 Change “Components” to “ECU recording data as EDR function” because “Components” is too broad.

3.5	A drawing of the assembled EDR and an indication of its position on the vehicle;	<ul style="list-style-type: none"> Modified to 3.2.3 because it is a chapter accompanying 3.2
3.6	The Type Approval Authority shall verify the existence of satisfactory arrangements for ensuring effective control of the conformity of production before type approval is granted.	<ul style="list-style-type: none"> Delete this sentence because it is specified in chapter 8.1

5 Specifications

	draft	Comment
5.4	<p>Information</p> <p>For vehicles fitted with EDR the owner's manual shall include information that the vehicle is fitted with an EDR. On publication means (e.g. owner's manual, maintenance manual, official web site) information about data retrieval shall be made accessible.</p>	It's better to decide the fixed format as in Part563 because different text in each OEM may cause user confusion.

6 Test Procedure

	draft	Comment
6.2	Vehicles not subject to the requirements of UN Regulation No. 94 shall be approved in agreement between the manufacturer and the Technical Service.	The content of the agreement is unclear. More details should be clarified.(e.g. The test shall be carried out by the method agreed upon between the manufacturer and the Technical Service)