

**U.S. Comments and Suggestions on  
Japan Proposal To Develop a Global Technical Regulation  
Concerning Uniform Provisions for Common Tasks  
(TRANS/WP.29/2003/17, dated 9 January 2003)**

Transmitted by the Representative of the United States of America

**Comments and Suggestions:**

**Document Title**

The US believes that this is an important document and should be used as guidelines for all future GTRs. It provides a uniform category, mass and dimensions of vehicles and helps contracting parties avoid confusion during the establishing and adopting future GTRs.

However, we think that the proposed global technical regulation (GTR) should be identified as a reference document due to the following reasons. The regulation has been developed to be used only in future GTRs and it does not meet all required criteria for a technical regulation listed under article 4 of the 1998 agreement, specifically, the performance requirements. In addition, if this document were an official GTR, all contracting parties that voted in favour of establishing the GTR would be obligated to initiate procedures to adopt such a technical regulation into its own laws or regulations per article 7 of the 1998 agreement.

Accordingly, we propose to change the title of the document as follows:

**“PROPOSAL TO DEVELOP REFERENCE DOCUMENT CONCERNING  
UNIFORM PROVISIONS SETTING FORTH COMMON DEFINITIONS AND  
PROCEDURES TO BE USED IN GLOBAL TECHNICAL REGULATIONS”**

**First paragraph**

Replace the second sentence with the following:

**“In order to decide which types of requirements and which levels of stringency are appropriate for adoption in global technical regulations, it is necessary to have a common understanding of which vehicles will be covered. Japan proposed to create that common understanding by establishing agreed upon definitions.”**

**Third paragraph**

Replace the whole paragraph as follows:

**“The establishment of the definitions of the category, mass and dimensions of vehicles will help us establish GTRs that internationally improve the safety and environmental protection features of automobiles, and that will reduce development and manufacturing costs as well as costs to consumers.”**

### **Description of the Proposal Regulation Section**

Under section (1), add an additional bullet as follows:

**“This document is not a GTR in the sense that it does not contain performance requirements as listed under Article 4. Therefore, this document does not trigger obligations of article 7 requiring contracting parties to initiate procedures for adopting GTRs.”**

Replace section (3), as follows:

**“Only “common definitions” for basic terms necessary to define the vehicle categories and characteristics of obvious use in the formulation of safety regulations shall be developed based on present-day definitions of contracting parties and relevant international standards.”**

Under section (4), add the following **bold** text:

**“...WP29 may request GRSG to examine them and recommend whether they should be added to....”**

In the next to last paragraph of this section , remove the text as shown and add the following **bold** text:

**“This proposal for a “Global Technical Regulation Zero” (Attached sheets) ~~has been~~, sponsored by Japan, is based on the work of ~~prepared by~~ the GRSG informal group that worked ~~met~~ from October 2000 to October 2002 ~~taking~~ and took the above points into account.”**

### **Existing regulations and directives Section**

Add statutes to the section title:

#### **Existing Statutes, Regulations and Directives**

Replace the first part of the first paragraph as follows:

Original: “Though there are no regulations currently contained in the Compendium of Candidates, the following regulations were taken into account...”

Replace as **“There are no regulations currently contained in the Compendium of Candidates. The following statutes and regulations** were taken into account....”

Add the following bold text to the USA Motor Vehicle Safety Act and add two additional safety acts as follows:

USA: National Traffic and Motor Vehicle Safety Act **and 49 CFR 571.3**  
**Motor Vehicle Information and Cost Savings Act**  
**Clean Air Act and 40 CFR 86**

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