

1958 AGREEMENT:
PROPOSAL FOR ELECTRONIC TREATMENT OF TYPE APPROVALS
Transmitted by the secretariat

Introduction:

For several years, the Administrative Committee for the Coordination of Work (WP.29/AC.2) of the World Forum for Harmonization of Vehicle Regulations (WP.29) has considered the possibilities of electronic treatment of type approvals granted according to UNECE Regulations. The objective is to reinforce the transparency and the efficiency of the 1958 Agreement. The most relevant points are the creation of a communication system on interpretation issues, the establishment of an interpretation committee, and the creation of an electronic database for type approvals issued by the Contracting Parties to the 1958 Agreement (TRANS/WP.29/885, para. 14, TRANS/WP.29/909, para. 14, TRANS/WP.29/926, paras. 17 and 80, TRANS/WP.29/953, para. 16, TRANS/WP.29/992, paras. 9 and 10, TRANS/WP.29/1016, paras. 75 and 77).

Interpretation issues

Within the Contracting Parties to the 1958 Agreement, the type approval authorities as well as their technical services are dealing, at the present time, with the 121 UNECE Regulations annexed to the Agreement. In their daily type approval business, they have to make interpretations of the technical provisions of these Regulations. In case of borderline issues, problems may occur by the different interpretation by the approval authorities of the regulatory text (e.g. different wording/understanding of the provisions in the three official languages, application of the provisions to new technologies, etc.).

At the one-hundred-and-thirtieth session of WP.29 in June 2003, the delegate from the United Kingdom presented an example on how to improve the communication between the Contracting Parties on the common interpretation of UNECE Regulations. At its one-hundred-and-thirty-first session, WP.29 considered a proposal tabled by France (TRANS/WP.29/2003/100) as well as a proposal for amendments to that document tabled by the Russian Federation (TRANS/WP.29/2003/101). During the one-hundred-and-thirty-first session of WP.29, AC.2 agreed to investigate the feasibility of establishing of an electronic system for the exchange of information to be integrated, for test purposes, on the WP.29 website.

At the present time, the secretariat is studying (jointly with the UN services in charge of the website) the technical possibilities, the definition of responsibilities as well as the costs of such a system.

This **Regulation Interpretation Bulletin Board** (RIBB) should be integrated into the WP.29 website on the basis of a secured environment to ensure limited access to the system. Annex 1 to this document contains a proposal for the Terms of Reference and a User Guideline of the RIBB. The case of unresolved interpretation issues could be considered by an Interpretation Committee (IC). The IC would recommend solution for the unsolved issues to WP.29/AC.2. The possible establishment of an IC will be considered by WP.29/AC.2 on the basis of TRANS/WP.29/2003/100 and TRANS/WP.29/2003/101. Based on the decision by WP.29, a proposal for the Terms of Reference of the IC should be prepared.

Database for type approvals

Based on the experiences gained by the use of the above-mentioned RIBB system an electronic database system for a type approval data-exchange under the 1958 Agreement should be established. A proposal for this electronic **Database for the Exchange of Type Approvals** (DETA) is shown in Annex 2 to this document.

Annex 1

REGULATION INTERPRETATION BULLETIN BOARD (RIBB)

Terms of Reference

WP.29/AC.2 considered the feasibility of creating a Regulation Interpretation Bulletin Board (RIBB).

The following conditions were agreed upon:

1. RIBB should be part of the WP.29 website (applying the same structure, shape and format as the existing UNECE website).
2. The hosting (internal or external) of the system should be identified by the UNECE secretariat.
3. RIBB should have a secure environment in order to ensure limited access to the system (https://...).
4. RIBB should allow access (not simultaneously) up to 1,000 end-users (further upgrades must be possible).
5. All permanent members of WP.29 (Contracting Parties and organizations) taking part in WP.29's activities should have generic access to the system. The administration of the generic RIPP-users (one per delegation) will be assured by the UNECE secretariat.
6. Each generic RIPP-user has to administer the usernames under its responsibility (limited in a first step to 25 per generic user).
7. RIBB should be structured by events.
8. Only common used types of files should be used for the exchange (i.e. PDF, MSWord, Excel, Powerpoint).
9. UNECE is not responsible for the electronically files, documents and figures submitted to and published by the RIBB system.

User Guidelines

In order to efficiently manage the RIBB (defined disc space, structure, etc.), the following working rules should be followed for creating of interpretation request:

- a) An interpretation request shall bear a short title and shall be specified in a clear and unambiguous manner (e.g. by referring to paragraphs of the Supplement to a Series of amendments to the Regulation concerned or by giving detailed examples, etc.).
 - b) The request shall be dated and identified by the name, organization and telephone of the sender.
 - c) The request may be marked with a priority level (e.g. "urgent" or "not urgent"). In case of urgent requests, the preferred date for a reply has to be mentioned.
 - d) A request may initiate the spread of an electronic mail to all or a part of the RIBB users indicating the short title of the interpretation problem.
 - e) A reply shall be allocated to a specific interpretation problem, set up under the conditions of a) and b) above.
 - f) If a clear position can be reached within the discussion forum, the initiator should conclude the interpretation issue and prepare the conclusion to be archived in the system, together with the initial interpretation request. In that case, all other exchanged data (reply/comments) on that specific discussion issue should be deleted from the RIBB after a [two-month] period of time following the date of conclusion the interpretation issue.
 - g) If no clear position is reached or if an amendment to the Regulation concerned is requested, the sender should inform the Working Party in charge of the Regulation concerned. The Working Party will propose the most appropriate solution to the interpretation problem, and initiate, if necessary, an amendment to the Regulation.
 - h) If the Working Party concerned is not in the position to take a decision on the subject, the interpretation issue will be submitted for consideration to the Interpretation Committee (IC), which will take the final decision.
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Annex 2

DATABASE EXCHANGE OF TYPE APPROVALS (DETA)

An electronic database of type approvals issued by the Type Approval Authorities (TAA) of the Contracting Parties (CP) to the 1958 Agreement should be established. The following possibilities should be taken into account:

Homepage with an hyperlink address list of all TAA:

On the WP.29 website, a new homepage should be created (and continuously updated) listing the designation of all administrative departments of the CP to the 1958 Agreement. This list will include the hyperlinks to the website of the concerned administrative departments of the CP. By simple clicking on the link of one of the TAA, their website will be opened. The TAA has to ensure the secure access from its website to a database on which all type approval certificates (as well as the technical reports), delivered by its administration, could be consulted. The format of that files should be PDF.

Each CP should administer, under its responsibility, the usernames of the applicants which can access to the database. The procedure on how to apply for a username and how the database has to be structured (by Regulation number.) will be settled out by WP.29/AC.2 in the Terms of Reference of the DETA. If a CP has not yet installed a website with a link to his type approval database, the above mentioned hyperlink has to refer to a file with the coordinates of a contact person to whom document requests may be send.

This solution could be realized in a quite short time, depending on the availability of the website server of the TAA. No further costs will rise for the UNECE system.

Installation of a database for the exchange of type approvals

Based on the experience made by the future Regulation Interpretation Bulletin Board (RIBB) system, as well as on the experience made by the existing European Type Approval System (ETAES), which is installed for the purpose of a pilote project on a server with the German type approval authority (KBA) in Flensburg, a new database system should be established at the UNECE, on which the type approval authorities could store their type approvals. This DETA should be a secure environment with restraint access (https). The files could be consulted or downloaded by all the TAA of the CP. An outsourcing of this project should be possible. The access to the database, the procedure on how to apply for a username and some major technical details (how the database has to be structured, format of files, search features, etc.) will be settled out by WP.29 in the Terms of Reference of the DETA.

This solution requires a considerable investment by UNECE into a new database server with a large disk capacity (200 pdf files/day à 0.5 MB/file = 100 MB/day ~ 25-30 GB/year) and requires also a clear definition of responsibilities by UNECE, CP and the automotive industry (as type approvals are in general classified as confidential documents).
