

## R13-H – FMVSS 135 CONTENTIOUS ISSUES

### Differences in Philosophy

#### **1 Checking Procedures**

R13-H specifies constructional and operational requirements in detail and these have to be checked as part of the Type Approval process.

FMVSS 135 specifies fewer constructional requirements but checking procedures are not written into law although test procedures are provided instead for major features.

#### **2 Performance Requirements and Test Procedures**

Performance levels are largely harmonized but the test procedures need to be similarly comparable and the order of testing specified as in 135.

Surface adhesion levels need to be specified and **mean fully developed deceleration** used for performance evaluation if alignment is to be achieved.

Dynamic Parking braking performance will be required.

#### **3 Braking performance of Electric/Hybrid vehicles**

The requirements for these vehicles are in need of re-alignment through discussion.

#### **4 System requirements for Electrical Control Functions**

Much effort went into the development of the Reg.13-H requirements and test procedures for ABS,EPB and EBS and these are unlikely to be lightly abandoned. This will be an area for discussion in the GTR.

### Differences in Technical Details

These have been listed under:

Points of Clear Disagreement GTR doc. 2003/4 p6

Points of Minor Disagreement GTR doc. 2003/4 p7

Discussion, in a spirit of compromise, needs to take place on the issues listed in the above document.