CHAPTER 9.2
Compliance of vehicles with regard to braking equipment

Comments by the Government of Germany on TRANS/WP.15/2005/26

1. In principle, Germany supports the effort of France to clarify the provisions on braking equipment. However, three important technical developments to improve safety need reflection in the amendments proposed by France:
- endurance braking system for motor vehicles, introduced in ECE-R 13, 06 series;
- automatic anti lock braking system for vehicles, introduced in ECE-R 13, 06 series;
- brake adjuster for vehicles, introduced in ECE-R 13, 09 series.
In addition, new(er) vehicles shall fulfil the ECE-R 13 series of amendments (or the adequate EC directive) applicable at the date of their first registration to avoid downgrading of braking equipment at a later stage, e. g. on repair or replacement of broken parts.

2. Taking into account the French proposal and the explanations given above Germany proposes the following amendments:

In the table in 9.2.1, under the heading “Braking equipment”:

- amend comment d to read:
“As from 1 January 2010, all vehicles must meet the requirements of ECE Regulation No. 13 or of Directive 71/320/EEC as amended applicable at the date of their first registration, but at least ECE Regulation No. 13, 06 series of amendments or Directive 71/320/EEC as amended by Directive 91/422/EC.”

- amend comment g to read:
“As from 1 January 2010, all motor vehicles must meet the requirements of ECE Regulation No. 13 or of Directive 71/320/EEC as amended applicable at the date of their first registration, but at least the Regulation No. 13, 09 series of amendments or Directive 71/320/EEC as amended by Directive 91/422/EC.”