

**NON CONSOLIDATED OICA COMMENTS ON EVSC #1
(DOCUMENT EVSC05-38)**

1. Annex 21, para. 2.1.1

"...the function shall have the ability to automatically control individual wheel speeds ..."

This is acceptable for 2 axles vehicles (and necessary) but not for more than 2 axles vehicles, e.g. 6x4 ... It is sufficient for stability function to control 4 wheel groups: FL, FR, RL, RR. This is state of the art.

Proposal: *"... the function shall have the ability to control independently left and right wheels of each group of axle."*

2. Annex 21, para. 2.1.4

"... the signal shall be visible to the driver, even in daylight, such that the driver can easily verify the satisfactory condition of the signal without leaving the driver's seat."

Does this mean a special means has to be available for the driver to verify the satisfactory condition of the signal? Should it be done automatically during power-on phase, the same way it is for e.g. ABS warning signal? This may be acceptable for a failure warning but not for a simple information to the driver.

3. Annex 21, Appendix 1 – Dynamic stability simulation

Paragraph 1.1.1 states that *"the model shall include at least the following vehicle parameters ..."*

This is too stringent. If one wants to mandate a list of parameters to be used in the simulation, then a parameter sensitivity analysis is needed to select primary parameters and leave secondary ones, the same way it was done for R111. However, this is a huge work, where vehicle manufacturers are probably not ready to share information too deeply with their competitors/other parties (as this is core knowledge of manufacturers).

Until we have such an analysis, and more experience about simulation for the purpose of homologation, the parameter list and the simulator description should only give general hints and examples, the same way it was in the previous revision 4 of the document ("This appendix defines an example of a simulator that may be used ...")

4. Annex 21, Appendix 1, para. 3 – Vehicle load condition

"... in the case of a tank vehicle the normally intended load shall be considered as an equivalent fixed load."

This should be consistent with R111 (e.g. water-filled tank ...)

5. Annex 21, Appendix 1, para. 4 – Validation of the simulation tool

In paragraph 4.2 it is mentioned that *"the modelling and simulation tool can be regarded as valid when the simulation data is within [5%] for a steady state test and within [10%] for a dynamic test of the practical test data."*

Inputs and outputs from the simulation should be defined, if one wants to define acceptance criteria. The question is: are we able to define this today? In any case, 5% or 10% seems difficult to achieve, as test result spread from one test to another is often more than this rate.

6. Annex 19, para. 6.1.1

This paragraph mentions a *"test procedure to determine the performance of a vehicle stability function."*

This is not consistent with the rest of the proposal, which requests a "dynamic demonstration".

7. Transitional provisions (document EVSC 05-39)

24 months for "new types" is definitely too fast for industry to implement EVSC in all N3 > 16 tonnes ADR ... (same for trailers and probably coaches).

Our proposal would be to only request an "all types" application, 48 months after date of entry into force.

8. EVSC 05-42 Statistics ESP study

48,6% of accidents occurs on slippery roads, 51,4% on dry roads.
62,8% of accidents are related to skidding (YC related).

It means at least 14,2% of total number of accidents (i.e. almost 25% of YC relevant accidents) are related to skidding on dry roads, which sounds strange for a commercial vehicle with high COG.
