

Japan's Comments on EVSC05-38rev3, an amendment proposed to Reg. 13

1. Demonstrative test method

Paragraphs 2.1.3. and 2.2.3., Annex 21, refer to the demonstrative test method for approval and stipulates that “Until unified test procedures are agreed, the method by which this demonstration is carried out shall be agreed between the vehicle manufacturer and the Technical Service.” In our opinion, a specific time limit should be imposed here such as “within five years from the date of enactment of the regulation”.

2. Accuracy of the simulation model

Paragraph 2, Annex 21, Appendix 2 refers to the validation of the simulation model. We find that the requirements for the accuracy of the simulation model are currently not fully defined and believe hence that they should be clearly specified.

3. Vehicle types to which the mandatory installation requirement is applicable

The proposal says that the vehicle types to which the mandatory installation requirement is applicable are specified in the main text of the Regulation 13, but the Regulation 13 gives an impression that the Annexes are something independent from the regulation, e.g. Annexes 19 and 20.

We are afraid that, by removing “when mandated” from the header, the proposal might cause the requirement to be applied to all the vehicle types or also to optional vehicles types. We believe hence that the vehicle types to which the mandatory installation requirement is applicable should be specified also in Annex 21.