

Dear Sir!

Please find below the Volvo 3P comments regarding the latest version of the EVSC R13-document.

- Our position is based on the fact that there seems to be a fairly common understanding in the EVSC informal group that the concept in document EVSC05-38 rev 3 can serve as a base for a definition and approval of electronic stability control systems. The concept being more specification requirements than performance requirements.
- In order to be able to use this concept to qualify an EVSC without formal performance testing, there is a need for an agreed and reasonable level for the specification standard. In this respect, we can agree to the approach of Mr Gaupp.
- The main pending specification item seems to be the 'only one axle-' concept in § 2.1.1 for motor vehicles and § 2.2.1 for trailers. Regarding motor vehicles, and specifically considering the full range of commercial motor vehicles, we however feel that there is a need for further discussions. It seems obvious, given the time available, that we can not reach a full agreement on this, we propose to support the idea of Mr. Knowles, i.e. to put these §:s in square brackets for the time being. This would be the only way to table, in due time, a formal document with GRRF for their subsequent decision and guidance. A decision that might be a Yes or a No.
- We can also support the logic given by Mr de Haes that the current proposal is a good enough compromise to be justified towards GRRF. This even if GRRF has not yet agreed 100 % on the principle of specification versus performance testing.
- Regarding the referred dynamic manoeuvres, for instance in § 2.1.3 and 2.2.3 we feel that most of them are not suited for the purpose of approving EVSC on heavy vehicles. We are however informed that ISO SC9 have initiated the work with test methods aiming at EVSC on heavy vehicles why we propose to await the result of this work.
- A few paragraphs in the documents, marked in 'blue' in rev 3 have not yet been discussed in detail. They might not be very important but still worth mentioning.
- Transitional provisions have not yet been discussed. One reason being that the mandating is not in the scope of this group. We however want to point out that this is an important item to consider, not to be forgotten by GRRF. The industry will need substantial leadtimes even if we are talking about a voluntary regulation.

We see no reason for an additional meeting at this stage.

Best regards

p-o rydberg/ pierre teyssier

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