

## **Remarks by Germany on the conclusions of the DEG (06-R41WG-07a1e)**

During the 9th meeting of the R41 Informal Group (IG) on 3 September 2007 in Geneva, Germany opposed the adoption of the conclusions of the Data Expert Group (DEG) as presented in document 06-R41WG-07a1e. Germany would like to explain this decision below.

### **Database**

Germany is concerned that the database from which the DEG draws its conclusions is not yet sufficiently representative. We hold that representativeness should be established in each vehicle class with regard to vehicle type and engine capacity as well as with regard to region of origin. In particular we suspect that vehicles of Class I and European origin are missing in the database. To check the representativeness of the database, Germany suggests that information on the manufacturer of each vehicle be included in the database. With this information it will be possible to assess the need for an amendment of the database.

### **Limit values**

General remark: It is the understanding of Germany that the proposal of limit values is not part of the task of the DEG. Before the discussion of limit value proposals, a method for deriving limit values from the available data should be agreed upon in the R41 IG. The so-called standstill values presented by the DEG are constructed as legal-remains-legal values. As such these values must not be misinterpreted as standstill values or values equivalent to the current limit values.

### **ASEP**

The ASEP limit line presented by the DEG is derived as a legal-remains-legal line. Such a line is necessarily defined by the behavior of single vehicles rather than some property of the sample of vehicles measured. The same is true for the derivation of the proposed ASEP cut-off limit of 130 kW/t. Germany suggests focusing on proposals which are insensitive to single vehicles.

Germany opposes a general exclusion of vehicles equipped with a CVT. Rather than exempting a specific technology possible exemptions should be based on performance parameters.

### **Transparency**

Germany would like to suggest that all documents by the DEG be placed on the GRB website in due time to provide transparency to all members of the R41 IG.