

TO MEMBERS OF THE GRB INFORMAL GROUP ON MOTORCYCLE NOISE EMISSIONS

The experts from the European Commission and Germany have made some remarks concerning the activities of the informal group on Reg. 41 with particular regard to the conclusions of the Data Expert Group (DEG).

In this respect, as R41 WG chairman, I would like to thank these delegations for their constructive comments and I hope that for the future this active contribution and involvement in technical discussions related to the revision of ECE R41 will continue leading the EU to upgrade its own motorcycle type approval legislation (multi-Directive 97/24/EC chapter 9).

R41WG chairman also invites the EC to provide guidance in terms of how to proceed with the limits determination (since on the basis of earlier indications, it seems that a “double testing” approach should not be followed).

R41WG chairman hopes that in the meantime more detailed/practical editing work can start on the basis of the draft amending document that was delivered by Italy.

With regard to the specific remarks made by EC and Germany, my opinion is the following

Database

The database analysis was performed by DEG on behalf/request of R41WG and in co-operation with GRB.

DEG is composed by representatives of Japan (JASIC), Italy, TUEV (Mr Steven), ISO and the industry (IMMA).

Class 1 was already extended on request of Japan to cover the typical 50cc motorcycle class. Class 1 motorcycles (PMR<25) practically do not exist on the EU market (only mopeds have PMR<25 in Europe) and should therefore not be of any concerns to the EC.

During its 5th meeting, DEG agreed to extend the database with information on the origin of the tested motorcycles to ensure optimum transparency across all classes.

Limit values

DEG (not the industry), again on behalf/request of R41WG and in co-operation with GRB, established a method for filtering the available data to calculate standstill values (i.e. limits on new procedure that give comparable level of stringency after exclusion of all invalid data points). As discussed and agreed by R41WG in September 2007, DEG would also look for a suitable methodology for future limit evaluation for review and discussion by R41WG and approval by GRB. It is clear that this evaluation will be technical while further assessments based on political considerations fall in the competence of WP.29.

Additional Sound Emission Provisions (ASEP)

In the entire ASEP database, the DEG expert members deleted two examples with noise behavior that could not be considered acceptable nor typical. It is therefore incorrect to state that a legal remains

legal approach was used. At its 5th meeting, DEG has agreed to reconsider the best possible ASEP concept to ensure that perverse consequences and loopholes are avoided.

DEG expert members have also reconsidered a possible PMR threshold and do not favor an exemption based on technology (CVT) but based on performance requirements derived from actual behaviors (as CVT does). DEG is of the opinion that the scope for ASEP can be limited to class 3 because of minimal engine speed differences between the ISO and ASEP tests for classes 1 and 2. This conclusion will be reported to R41WG and GRB.

Transparency

Basically all major documents and data-tables by DEG were provided to R41WG directly and posted on the GRB website as attachments to the DEG reports. At its 5th meeting, DEG agreed to make an inventory of all remaining DEG documents for posting them on the UN/ECE website.

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Chairman of R41 WG