

GRRF AEBS/LDWS Informal Working Group

CLEPA comments to documents AEBS/LDWS-11-02-Rev.1 and AEBS/LDWS-11-03-Rev.1

- A single regulation approach as proposed by the 2 above mentioned documents can be supported on the bases of the following comments and that square bracketed items have still to be agreed. Naturally CLEPA looks forward to discussing the square bracketed items and draws attention to the values proposed in CLEPA document AEBS/LDWS-10-02.
- CLEPA agreed to the removal of text from the “Specification” (e.g. second part of paragraph 5.2.4., document AEBS/LDWS-10-02) on the understanding that its purpose would be covered in an “Introduction”. It is observed that document AEBS/LDWS-11-02-Rev.1 includes neither an “Introduction” nor the originally proposed wording.
- The “Scope and purpose” contains the requirements for AEBS to be fitted only to vehicles having pneumatic braking systems and pneumatic rear suspension. It is considered that this general exclusion is inappropriate and that any exclusion should be directed at specific vehicle types.
- The inclusion of a false reaction test is full supported by CLEPA, however CLEPA has always proposed that the test(s) should also have a “no false warning” requirement. This is not shown in the 1st paragraph 6.10. proposal.
- The “overhead bridge” and the alternative “gantry road sign” in the 2nd paragraph 6.10. proposal are considered to add complexity without adding real world benefits. Both the “overhead bridge” and the “gantry road sign” would need to be specified so as to provide a common understanding of the structures for the Technical Services, the vehicle manufacturers and the system suppliers. While the system suppliers will design the AEBS to cope with all types of bridge design – flat, arch supported, solid, open, steel, pre-stressed concrete, etc. – the definition of a single representative structure would be a complex issue. There would also be similar difficulties in defining a representative gantry road sign. Therefore, as the false warning/false braking test(s) can only be indicative no matter how many there are, CLEPA is of the opinion that the consideration of such structures as overhead bridges and gantry road signs should be covered in the specification text or in a general introduction.

These comments are also applicable to the overhead “road sign” aspect of the 3rd paragraph 6.10. proposal.

- The “adjacent vehicle in a curve test” in the 2nd paragraph 6.10. proposal is similar to one of the 3 false warning tests proposed by CLEPA in document AEBS/LDWS-TF02-06. In discussing the proposed test it was acknowledge that the test is relatively difficult to conduct on a consistent basis and the availability of suitable type-approval facilities could be a problem. As a result CLEPA withdrew the “curve” and “alley way” false warning tests in favour of the “overtaking” test. Subsequent comment with regard to difficulties of

conducting the overtaking test on a consistent basis resulted in CLEPA moving to the alley way test, as it is a simple test that can be consistently reproduced. In reviewing this series of events CLEPA feels, as mentioned above, that whatever test(s) are chosen it/they can only be indicative and that an alley way test is appropriate as it is simple to conduct and is representative of a real world situation.

- Document AEBS/LDWS-11-03-Rev.1 proposes for the 01 series of amendments a 4 year transitional period starting in 2016. Although this timescale is dependent upon the decisions that are made with regard to the square bracketed items, it appears excessive considering the current state-of-the-art with regard to heavy commercial vehicle and passenger cars.
