

Input - P. Jennison (Knorr-Bremse)

Alternative proposal to AMEVSC-08-03e (GRRF-72-17) based on AMEVSC-08-04e

### **I. Proposal for amendments to ECE Regulation No.13 (Heavy vehicle braking)**

Paragraph 3.3. amended to read:

"3.3. A vehicle, representative of the vehicle type to be approved, shall be submitted to the Technical Service conducting the approval tests.

**Compliance with the testing requirements of this regulation shall be demonstrated by tests (e.g. according to Annex 4 of this Regulation) carried out on the submitted vehicle or, alternatively, by using a test report(s) in accordance with Annexes 11, 12, or 19.**

**Irrespective of the method of showing compliance used, the vehicle manufacturer has complete responsibility with regard to the conformity of the vehicle type to this regulation, and in using a test report to Annexes 11, 12 or 19, or using a simulation tool as allowed for in Annex 21, acknowledges that the used test report(s) or simulation tool fits to the vehicle type for which approval is requested.**

### **II Justification:**

The use of test reports in the type-approval process, specifically the possible use of an Annex 19 test report as an alternative method in meeting the vehicle stability function requirements as detailed in Annex 21, has been questioned in the development of supplement 9 to the 11 series of amendments of ECE Regulation No.13.

This proposal is to clarify the situation – ensure that the vehicle manufacturer is fully aware that responsibility is not given away when using a test report in accordance with Annexes 11, 12 or 19.

The use of test reports in Regulation No.13 was first introduced in Annex 11 (Cases in which Type-I and/or Type-II (or Type IIA) tests do not have to be carried-out) under the 05 Series of Amendments which entered into force 26<sup>th</sup> November 1984. Since then the use of test reports has been included in Annexes 12, 19 and 20 without any in-service problems being identified.