

## **OICA comments to proposal from Germany GRRF-2013-29 (Electro-hydraulic transmission for electric brake systems - 01/02 trailers)**

Given the potential consequences of the changes contained in the proposal (new values for minimum voltages, modification of test procedures, add-on of a tell-tale within the driver's direct or indirect field of vision), OICA recommends that more time be given to have deeper technical discussions with the German delegate about the proposals. The proposal actually introduces a number of technical changes where OICA needs more technical explanation and justifications.

The proposed amendments in Annex 14 do not only amend "test conditions for trailers" but introduce new technical requirements for both trailer and motor vehicle e.g. paragraph 2.7.

Some first technical questions and comments:

- Origin of the proposed 11.1 V value in paragraph 5.2.1.19.1 is unclear.  
Is there any bad experience with current minimum voltage?  
The technical consequences on the power supply system of the vehicle might be heavy, without clear benefits for safety.  
Changing this requirement may cause compatibility issues in the future, since vehicles with two different electric specifications would be available in the field.
- Same type of questions and concerns for the proposed 13 V in Annex 14, paragraph 1.4.1.
- Paragraph 1.6.: OICA requests clarification about the new provisions for the location of the plug and cable package (definition of "articulated vehicle combination").
- Comments to footnote 1/ of paragraph 1.6: *Under study. The chosen plug/socket combination shall have the same reliability and functional safety as the well-known plug/socket combination according ISO7638.*  
OICA wonders if reliability and functional requirements of heavy commercial vehicles ISO 7638 connector can directly apply to small trailer for passenger cars, with fully different usages.
- The proposed provisions for Annex 14, paragraph 2.7. are contradictory to UN R48 (installation of lamps) and to UN R46 (rear-view mirrors). These provisions indeed seem to permit the installation of a warning lamp at the front of the trailer, to be observed via the rear-view mirrors. This is contradictory to the provisions of:
  - UN R48 because no lamp other than white is permitted toward the front of a vehicle. In addition, such tell-tale could confuse the other road users.
  - UN R46 because the indirect fields of vision are defined in this regulation as areas on the ground which must be visible via the rear-view mirrors. Only a camera-monitor system, having a field of vision beyond those prescribed in this regulation, could achieve the proposed provisions.
- OICA wonders whether the current text, requiring a tell-tale on the control device, should be retained. This would in addition avoid tell-tale illuminations annoying to the driver (see proposed changes to paragraph 2.7.)
- The justification to paragraph 2.7 reads:  
"14. Similar to UN Regulation No. 55, Annex 5, para. 12.2.9."  
It must be highlighted that one objective of the informal group R55 (item 11) is to remove

the requirement that remote indicators shall be installed in the cab / in the driver's field of vision. The intention is to open the definition of remote indicators to the existing systems on the market where the remote indication is close to the remote control, e.g. on the chassis.

Thus, the reference to UN R55 in the justifications may become obsolete when this regulation will be revised.

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