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**Economic Commission for Europe**

Inland Transport Committee

**World Forum for Harmonization of Vehicle Regulations**

**Working Party on General Safety Provisions**

**115th session**

Geneva, 9-12 October 2018

Item 12 of the provisional agenda

**UN Regulation No. 116 (Anti-theft and alarm systems)**

Proposal for Supplement 6 to UN Regulation No. 116 (Anti-theft and alarm systems)

Submitted by the expert from the International Organization of Motor Vehicle Manufacturers[[1]](#footnote-2)\*

The text reproduced below was prepared by the expert from the International Organization of Motor Vehicle Manufacturers (OICA) to clarify the environmental testing requirements for keys. It is based on informal document GRSG-114-29, presented at the 114th session of the Working Party on General Safety Provisions (GRSG) (see report ECE/TRANS/WP.29/GRSG/93, para. 40). The modifications to the current text of UN Regulation No. 116 are marked in bold characters.

**I. Proposal**

*Paragraph 5.4.,* amend to read:

"5.4. ELECTROMECHANICAL AND ELECTRONIC DEVICES TO PREVENT UNAUTHORIZED USE

Electromechanical and electronic devices to prevent unauthorized use, where fitted, shall comply with the requirements of paragraphs 5.2. and 5.3. above and paragraph 8.4. below, mutatis mutandi. **Components that are not embedded in the vehicle (e.g. keys which are used for activation/deactivation) need not to comply with the requirements of paragraph 8.4.**

If the technology of the device is such that Paragraphs 5., 6., and 8.4. are not applicable it shall be verified that care has been taken to preserve safety of the vehicle. The functioning process of these devices shall incorporate secure means to prevent any risk of blocking or accidental dysfunctioning which could compromise the safety of the vehicle."

*Paragraph 6.4.,* amend to read (also deleting the reference to footnote 8 and the text of footnote 8 including the re-numbering the subsequent footnotes):

"6.4. OPERATION PARAMETERS AND TEST CONDITIONS

**Lamps which are used as part of the optical warning devices and which are included in the standard car lighting system need not comply with the operation parameters in paragraph 6.4.1. and shall not be submitted to tests listed under paragraph 6.4.2.**

**Components that are not embedded in the vehicle (e.g. keys which are used for activation/deactivation of the VAS) need not to comply with the operation parameters in paragraph 6.4.1. and are not required to be submitted to test listed under paragraph 6.4.2**."

*Insert a new paragraph 7.4.3.*, to read:

"**7.4.3. Components that are not embedded in the vehicle, e.g. keys**."

*Paragraph 8.4.1.,* amend to read

"8.4.1. Operation Parameters

All components of the immobilizer shall comply with prescriptions given in paragraph 6.4. of this Regulation.

This requirement does not apply to:

(i) those components that are fitted and tested as part of the vehicle, whether or not an immobilizer is fitted (e.g. lamps), or

(ii) those components that have previously been tested as part of the vehicle and documentary evidence has been provided, **or**

**(iii) components that are not embedded in the vehicle, e.g. keys**."

II. Justification

1. The key itself is not the protection device (anti-theft device), the key is merely an activation device. As a justification, it is noted that the user will notice if the key is defective, however, he might not necessarily notice if components of the alarm system fail.

2. The environmental tests specified in section 6.4. focus on components embedded in the vehicle (e.g. paragraph 6.4.1.1. on climatic conditions). The key per se is not embedded in the vehicle and, therefore, it should be clarified that the key need not undergo these tests.

3. Furthermore, it is proposed to include the text of footnote 8 into paragraph 6.4. as it is an important part of the test conditions.

1. \* In accordance with the programme of work of the Inland Transport Committee for 2014–2018 (ECE/TRANS/240, para. 105 and ECE/TRANS/2014/26, cluster 02.4), the World Forum will develop, harmonize and update UN regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate. [↑](#footnote-ref-2)