

Proposal for amendments to UN Regulation No. 116

The text reproduced below was prepared by the expert from OICA to clarify the environmental testing requirements for keys. The modifications to the current text of Regulation No. 116 are marked in bold characters for new and strikethrough for deleted 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., delete the reference to footnote 8 and the footnote 8, re-number the subsequent footnotes, and insert two new paragraphs, to read:

“6.4. OPERATION PARAMETERS AND TEST CONDITIONS⁽⁸⁾

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.”

~~(8) 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.”~~

Insert a new paragraph paragraph 7.4.3, to read:

“7.4.3. **Components that are not embedded in the vehicle e.g. keys”**

Paragraph 8.4.1., add a new item (iii), 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.
- (iii) **Components that are not embedded in the vehicle e.g. keys”**

II. Justifications

1. The key itself is not the protection device (antitheft device), the key is merely an activation device. As an illustration of this statement, it can be note that, while the user might not notice that components of the Alarm System (AS) are broken, he will always notice that the key is broken
2. The environmental tests given under section 6.4 are written for components embedded in the vehicle. (ge paragraph 6.4.1.1 on climatic conditions). The key per-se is not embedded in the vehicle, it should be clarified that the key is not part of these tests.
3. Footnote (8) of title 6.4 was integrate into the text of paragraph 6.4. When UN regulations are amended, footnotes are sometimes lost.
