Proposal for amendments to ECE/TRANS/WP.29/GRVA/2019/2 and ECE/TRANS/WP.29/GRVA/2019/3

Proposal 1 (Draft Regulation on Cyber Security)

The amendments to the text contained in document ECE/TRANS/WP.29/GRVA/2019/02 are in bold for new and in strikethrough for deleted text.

Paragraph 1.1., amend to read:

1.1.   This Regulation applies to vehicles of the categories [L], M, N, [O, R, S and T].

Proposal 2 (Draft Regulation on software update processes)

The amendments to the text contained in document ECE/TRANS/WP.29/GRVA/2019/03 are in bold for new and in strikethrough for deleted text.

Paragraph 1.1., amend to read:

1.2.   This Regulation applies to vehicles of the categories [L], M, N, [O, R, S and T].

Justification:

1.   The proposals for OTA and Cybersecurity requirements were developed with 4-wheelers in mind and the specificities for L-category were not taken into account.

2.   Conventional software updates for L-category vehicles are mainly through wired solutions. There are no OTA software update application solutions on motorcycles applicable today, at least, regarding safety related functions.

3.   The "Test Phase" and application for M/N vehicles should first be concluded and any difficulties should be studied before extending scope to all vehicles. IMMA will evaluate the application of the new UN Regulations and develop necessary amendments to the requirements so that they can be made applicable for L-category vehicles at the appropriate timing.

4.   Generally speaking, autonomous driving is equivalent to so called Lv.3 or higher, however with regard to motorcycles, even Lv.2 is unrealistic in the near future. Therefore, application for L-category vehicles is significantly less urgent.