

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. IMMA requests to temporarily exclude or postpone L-category in the draft new UN Regulations on Cybersecurity and on Software Update Processes.
2. IMMA suggests extending the scope of the new UN Regulations with L-category in a second step, after experience with application of the requirements for M/N vehicles is available, through a new Series of Amendments, after proper analysis.
3. IMMA has been monitoring the work of the Task Force on Cybersecurity and Over-The-Air issues and the drafting of the new UN Regulations. During the process, IMMA raised various questions (TFCS-12-15), but they could not be properly considered, due to priority on issues for M and N-category vehicles. As a result, the specificities for L-category were not taken into account at this stage and the TF agreed to keep L-category between brackets.
4. At 2/GRVA, IMMA's request (GRVA-02-18) to postpone inclusion of L-category was recognised; a special consideration for L-category should be taken into account. This is also consistent with what is stated in ECE/TRANS/WP.29/GRVA/2019/2 Page 14 7.5.6).
5. Experience should first be gained with the application of the Regulatory requirements on M/N vehicles in the marketplace, before extending the scope of the new UN Regulations to all vehicles. Feasibility and guidance for application on L-category vehicles would require a comprehensive review through an additional test phase addressing specific issues for the different L-category vehicles.
6. IMMA will evaluate the application of the new UN Regulations and develop necessary proposals for amendments to the requirements so that they can be made applicable for L-category vehicles at the appropriate timing.
7. Conventional software updates for L-category vehicles are mainly through wired solutions. Today, there are no OTA software update application solutions on motorcycles applicable, at least, regarding safety related functions.
8. IMMA believes that potential safety issues on software updates and cyber security are most critical for autonomous driving vehicles, because the control of the vehicle is performed by the Automated Driving system. Since even Lv.2 autonomous driving is unrealistic in the near future, the application for L-category vehicles is considered less urgent.