

India Comments on document ECE/TRANS/WP.29/GRSG/2015/16 submitted by the expert from the Fédération Internationale de l'Automobile for 01 series of amendments to Regulation No. 39 (Speedometer)

I. Background

Belgium had a proposal for draft 01 series of amendments to Regulation No. 39 (Speedometer) for inclusion of mandatory fitment of odometer. This has now come up as ECE-TRANS-WP29-GRSG-2015-15.

II. Comments

1. Experts from Fédération Internationale de l'Automobile (FIA) had proposed further amendments on this document vide ECE-TRANS-WP29-GRSG-2015-16. India recommends that the FIA proposal need not be incorporated in ECE R39, for the following reasons.
 - a. The FIA proposal to amend the definition of odometer as **“2.6 "Odometer" means that part of the information equipment which indicates to the driver the actual mileage of the vehicle resulting from any driving operation and include the (physical) measurement parts, the computation, the storage and alternative display options.”** is not correct since this is the definition of the Odometer system and not Odometer.
 - b. FIA proposal to introduce the new condition in clause 5.5 to the effect that **“If the odometer reaches its maximum value of display (e.g. 999,999 km), the display shall stop at the maximum value (e.g. 999,999 km)”** has a basic difficulty. The vehicle may run even after reaching this kilometer also and there will be no indication to what extent it has been run after 999,999 km. It will be possible to make an estimate from age of the vehicle if the odometer had once reached the maximum reading, and the current reading is the continuation.
 - c. FIA proposal to introduce the new condition in clause 5.5.1 to the effect that **“The total mileage displayed by the odometer shall not vary from the actual mileage covered by more than ± 4 per cent.”** is not practically feasible, for example, in many of the L category vehicles, the input to the odometer is the number of rotation of the tyre. Hence the odometer tolerance will depend upon the tolerance of dynamic rolling radius of the tyre. ECE R 75 do not specify this tolerance.
 - d. FIA proposal to include the malfunctioning and tampering and related clauses **5.5.2, 5.5.3 and Annex 5** may not be acceptable due to following reasons.
 - i. These requirements presuppose use of only electronic odometers and that the vehicle would be having an OBD.
 - ii. In the case of L category vehicle, as of now OBD is not a mandatory fitment anywhere. Europe is planning to mandate Emission OBD along with the new frame work directive in 2016/2017. This OBD does not anticipate any OBD for safety and other features.
 - iii. Use of normal mechanical odometers for L category vehicles are cost effective for the purpose of indicating the distance travelled.

2. In view of the above, India support the proposal for draft 01 series of amendments to Regulation No. 39 (Speedometer) submitted by the expert from Belgium vide document ECE-TRANS-WP29-GRSG-2015-15.
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