Submitted by the expert from FIA

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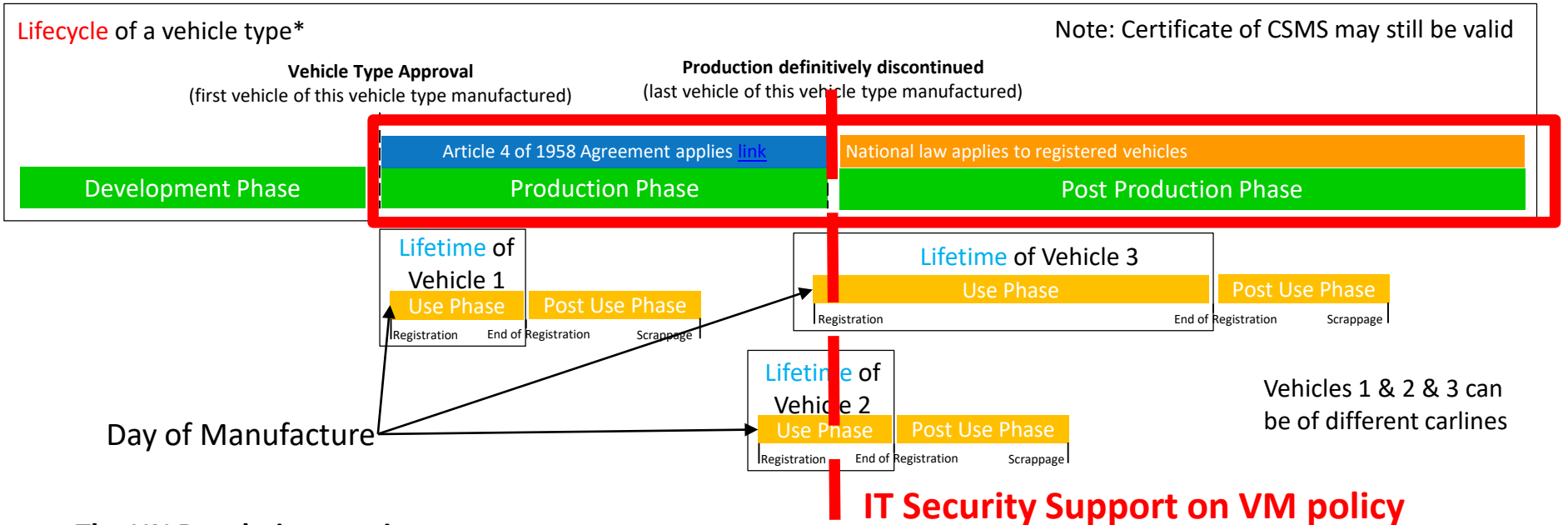
4th GRVA, 24-27 September 2019
Agenda item 5(a)

FIA position on
Lifecycle of a vehicle type* vs. Lifetime of a vehicle

OICA proposal on
Lifecycle of a vehicle type* vs. Lifetime of a vehicle



The UN Regulation requires:

- A comprehensive management system over the entire lifecycle of the vehicle type including
  - Risk management
  - Inclusion of suppliers
  - Field Monitoring
  - Incident response

OICA proposal

For clarification, replace systematically:

- Lifetime by "**lifetime of the vehicle**"
- Lifecycle by "**lifecycle of the vehicle type**"
- Only "**lifecycle**" covers the development phase

FIA position on
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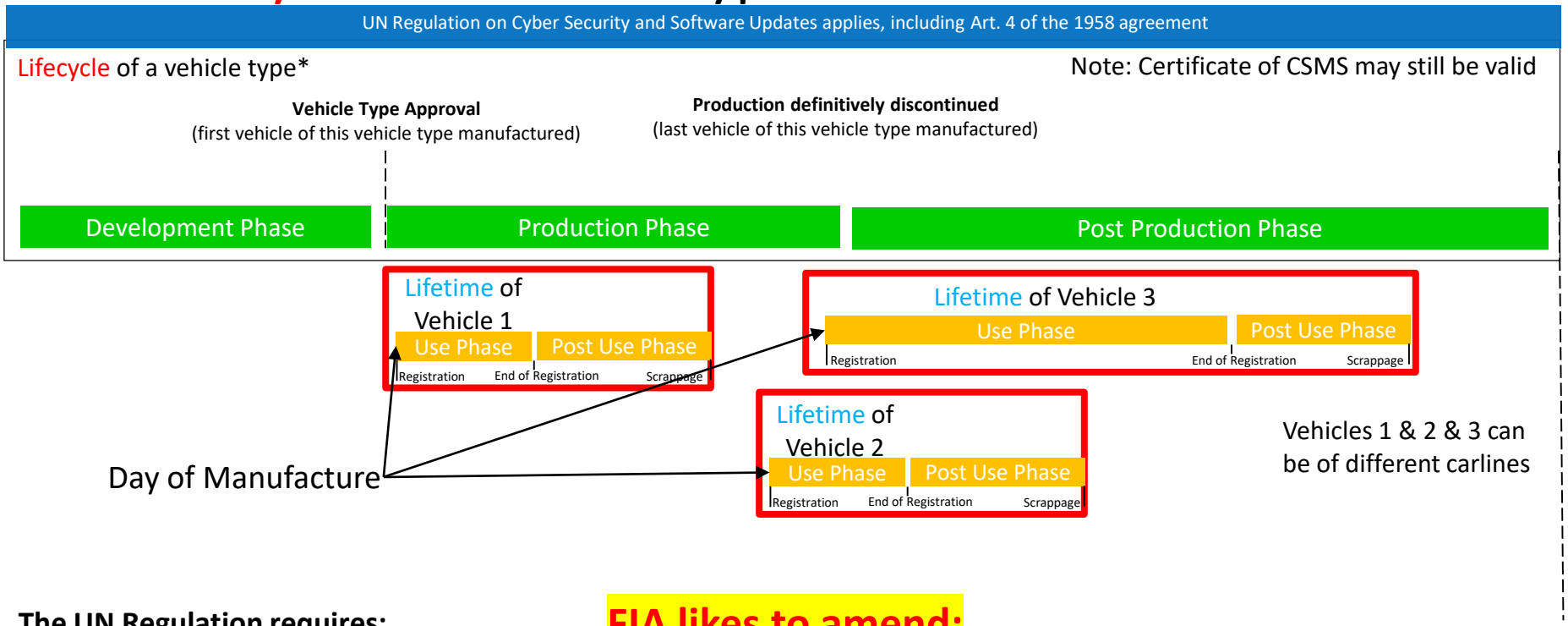

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FIA likes to amend:

- **"lifecycle"** is longer than all vehicle lifetimes and lasts at least until scrappage
- **IT security support must not end at the end of production**
- **Post Production regulation is covered by the 58 agreement**

FIA; How is cybersecurity covered over the lifetime of a vehicle?

- Post production is addressed in Annex A, § 7.2 of the UN requirements
  So far concrete measures like a minimum time or minimum mileage **are missing** and have to be added
- A **UN Regulation** (under the Geneva 1958 Agreement) is **appropriate** to cover the whole lifecycle. Existing examples are UN Regulation No. 59 (Replacement (retrofit) silencing systems, UN Regulation No. 83 (including durability requirements and "in use" requirements), UN Regulation No. 90 (Replacement braking parts) and UN Regulation No. 133 (Recyclability of motor vehicles). [see report ECE/TRANS/WP.29/GRVA/2]
- GRVA is working on considerations related to software updates and life-time provisions in the context of its cyber security and software updates activities. **The involvement of WP.29 should be envisaged** [see report ECE/TRANS/WP.29/1147]
- **Current legislations on national or regional level do not cover IT Security** issues, like updates of Soft- or Hardware. IT Security is a new area in automotive regulation and requires technical adequate specifications, like updated software with better performance
- "**Appropriate measures**" must be defined in detail, a simple risk control or other measures solely in the hands of VMs are not acceptable