

Comments to
[ECE/TRANS/WP.29/GRVA/2021/06](#) (for R156) and
[ECE/TRANS/WP.29/GRVA/2021/17](#) (for R157)

I. Proposal for a new series of amendments to UN Regulation No. 157 (Automated Lane Keeping System)

The additions and deletions are shown in **bold** text to facilitate identification of these proposed changes within the existing Regulation.

Amend paragraphs 9.3.1. and 9.3.2., to read:

“9.3.1. For the purpose of ensuring the software of the System can be identified, an R₁₅₇SWIN ~~may~~ **shall** be implemented by the vehicle manufacturer. ~~If R₁₅₇SWIN is not implemented, an alternative software identification system (i.e. software version) shall be implemented.~~

9.3.2. ~~If the manufacturer implements an~~ **For the implementation of R₁₅₇SWIN the following shall apply:”**

The subparagraphs of 9.3.2 stay unchanged.

Add new chapter 15., to read:

15. Transitional provisions

“15.1. **As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the 01 series of amendments.**

15.2. **As from [1 July 2022], Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, first issued after [1 July 2022].**

15.3. **Until [1 July 2024], Contracting Parties applying this Regulation shall accept type approvals to the preceding series of amendments, first issued before [1 July 2022].**

15.4. **As from [1 July 2024], Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued to the preceding series of amendments to this Regulation.”**

II. Justification

In documents [GRVA/2021/06](#) (for R156) and [GRVA/2021/17](#) (for R157), the expert from France suggests amendments to UN Regulation No. 156 (Software update and software updates management system) & UN Regulation No. 157 (Automated Lane Keeping System) concerning the alternative software identification system in order to introduce the same level of specifications as for the RXSWIN.

Recall of the definition of RXSWIN: "*RX Software Identification Number (RXSWIN)*" means a dedicated identifier, defined by the vehicle manufacturer, representing information about the type approval relevant software of the Electronic Control System contributing to the Regulation N° X type approval relevant characteristics of the vehicle.

With the amendments suggested by the expert from France, the difference between the requirements for RXSWIN and for the alternative software identification system would become negligible. The coexistence of two similar software identification systems will create worldwide diversity and disharmonization.

OICA and CLEPA believe that the removal of the alternative software identification system with appropriate transitional provisions would be the best way forward to ensure harmonization.

We recall that even by removing the alternative software identification system from UN Regulation No. 157, it is not mandatory to store the R₁₅₇SWIN on the vehicle.

