



OICA comments on Switzerland proposal (GRBP-74-02)



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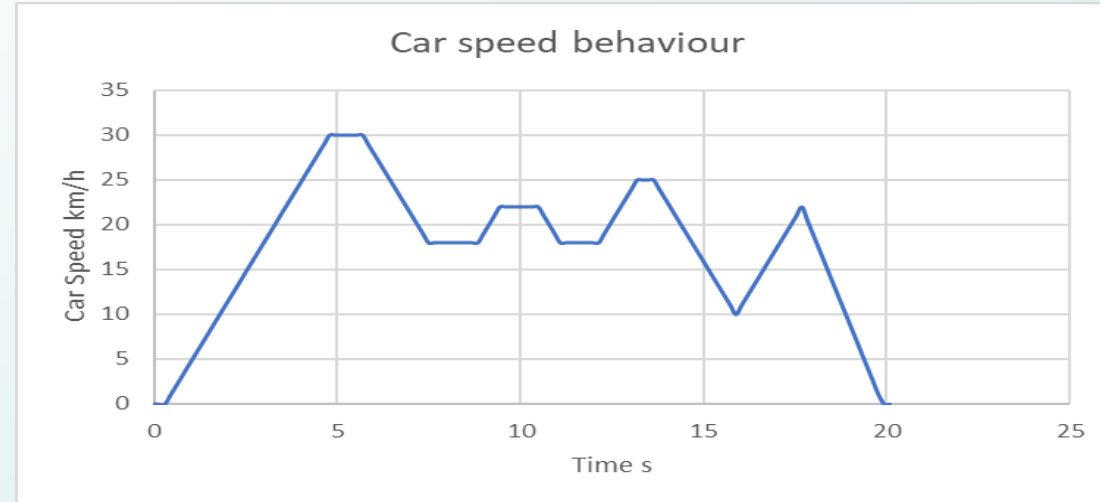
- Switzerland proposes to mandate a cut-off for AVAS above 20 km/h for environmental benefits especially in residential area.
- For Switzerland AVAS sound above 20km/h is a superfluous noise pollution and undermines noise abatement.

OICA position:

- Abrupt cut-off / on will induce for both car cabin passengers and pedestrians a harmful effects:
 - Noise annoyance due to impulse noise effect
 - Additional danger due understanding behaviour.
- The proposal from Switzerland would conflict with the original intent of UN R138 to ensure compatibility with FMVSS 141.
- We further refer to the presentation of the World Blind Union (WBU) GRB-62-16 where concerns were raised that “the proposed AVAS standard does not appear to add sufficient sound to existing electric and hybrid vehicles”.
- We are ready for a revision of UN R138 addressing all these concerns raised by France and Switzerland to outline a clear application range of AVAS. This revision shall as well address the need for a technical revision as suggested by ISO.

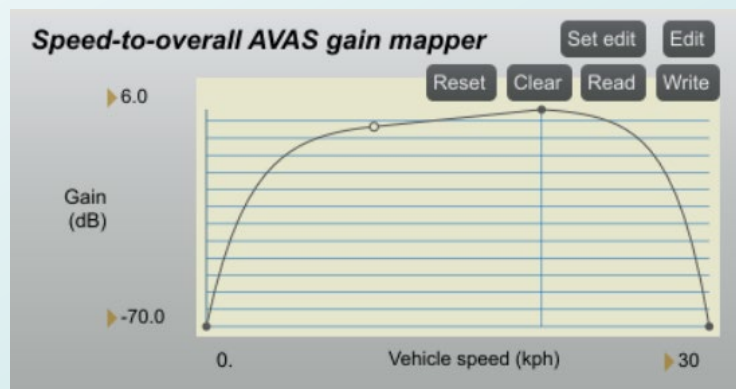
Sound comparison of AVAS with/without fade

- Audio example (simulation) in residential area with 30 km/h speed limitation:



Vehicle speed simulation based on real driving

With Fade



Without Fade

