

Questions and Answers/Comments in Session A derived from the Workshop on the implementation of UN Regulation No. 155 (8 July 2021)

I. Context

1. UN Regulation No. 155 was established to support vehicle cyber security. This regulation is rather unique in the framework of the 1958 Agreement and also in the field of cyber security. The regulation makes the vehicle manufacturer responsible for ensuring cybersecurity throughout the supply chain and the lifecycle of the vehicle. It requires addressing two types of requirements, those related to the cyber security management and those related to the type approval.

II. Specificities

2. The regulation does not provide a high level of details on the way to evidence the compliance with the requirements. The regulator chose to provide guidance in a guidance document instead of inserting them in the regulation. This choice has an importance in the context of the mutual recognition obligation of type approvals according to the provisions of the 1958 Agreement. The regulator therefore inserted in the regulation the obligation for the Approval Authorities to exchange information, via the Database for the Exchange of Type Approval (DETA) on the assessment method used in the context of this regulation.

III. Workshop on the implementation of UN Regulation No. 155

3. The Working Party on Automated/Autonomous and Connected Vehicles (GRVA) agreed that a workshop on the implementation of UN Regulation No. 155 is organized in 2021, see ECE/TRANS/WP.29/GRVA/10, para. 43.

4. The purpose of this workshop was to gather the Approval Authorities that are working on the provisions of para. 5.3. of the Regulation. Approval Authorities of CPs could report about the process of implementation for fulfilment of the requirements of the Regulation. An exchange could take place on the difficulties and challenges that occurred during this process.

5. The workshop was divided in two sessions, one of them being restricted to Approval Authorities (session A).

6. This document captures and summaries discussions in the session A of the workshop which was restricted to the approval authorities as a Q&A style. Some questions are still open and the comments related to such questions are noted.

7. The participants of the session A supported to hold additional sessions on the same purpose. The open questions and additional questions with regards to the implementation of the regulation may be addressed in the following workshops.

IV. Questions gathered and discussed

Categories	Questions	Answers (Comments) – under development
CSMS scope/assessment	How much detail manufacturers' documents should be assessed?	

	How the steps to Audit is configurated?	
	How to assess Stage-2-OEM?	
	How to assess outsourcing/suppliers?	
	For how long shall the OEM supply software updates?	
	One or more certificates for one applicant (legal person)?	
	Limited information about outsourced parts of the MS (antitrust legislation); Can the OEM accept an external Certificate as sufficient proof?	
	Market surveillance / security by OEM / approval authority after expiration of the approval	
	Required support of E/E-architectures developed before 1st of July 2024	
	How to handle different production sides within the scope of CSMS?	
Testing	What is the purpose of test by Technical Service?	
	How many tests? Chosen on what basis?	
	How will the sensitive information related vehicle type be treated?	
	Destructible test methods allowed?	
	How much effort (time) shall be spent (in particular on pen-testing)?	
Homologation process	What communication between the TS and the TAA?	
	Certificates / Approval for suppliers	
	Acceptance of foreign Certificates (for CSMS/SUMS) for the type approval	

	Approval with withdrawn or expired certificate	
	Extensions for vehicles with approvals under transitional provisions of UN-R 155	
Peer review exchanges via DETA	What level of details on interpretation, deliverables and rating of prescriptions is considered by the other TAA?	
	How to concretely respond to comments?	
	How much time to respond to comments?	
	How much time to integrate comments into the updated method & criteria?	
	What level of confidentiality for type-approvals & supplementing documentation?	

V. Follow up

8. It is proposed to organize a second workshop and to follow up on the questions raised to support a uniform application of the Regulation and to support the Contracting Parties in implementing paragraph 5.3 of the Regulation.