

Submitted by the experts from CLEPA/OICA

Informal document **GRVA-12-38**  
12th GRVA, 24-28 January 2022  
Agenda item 7

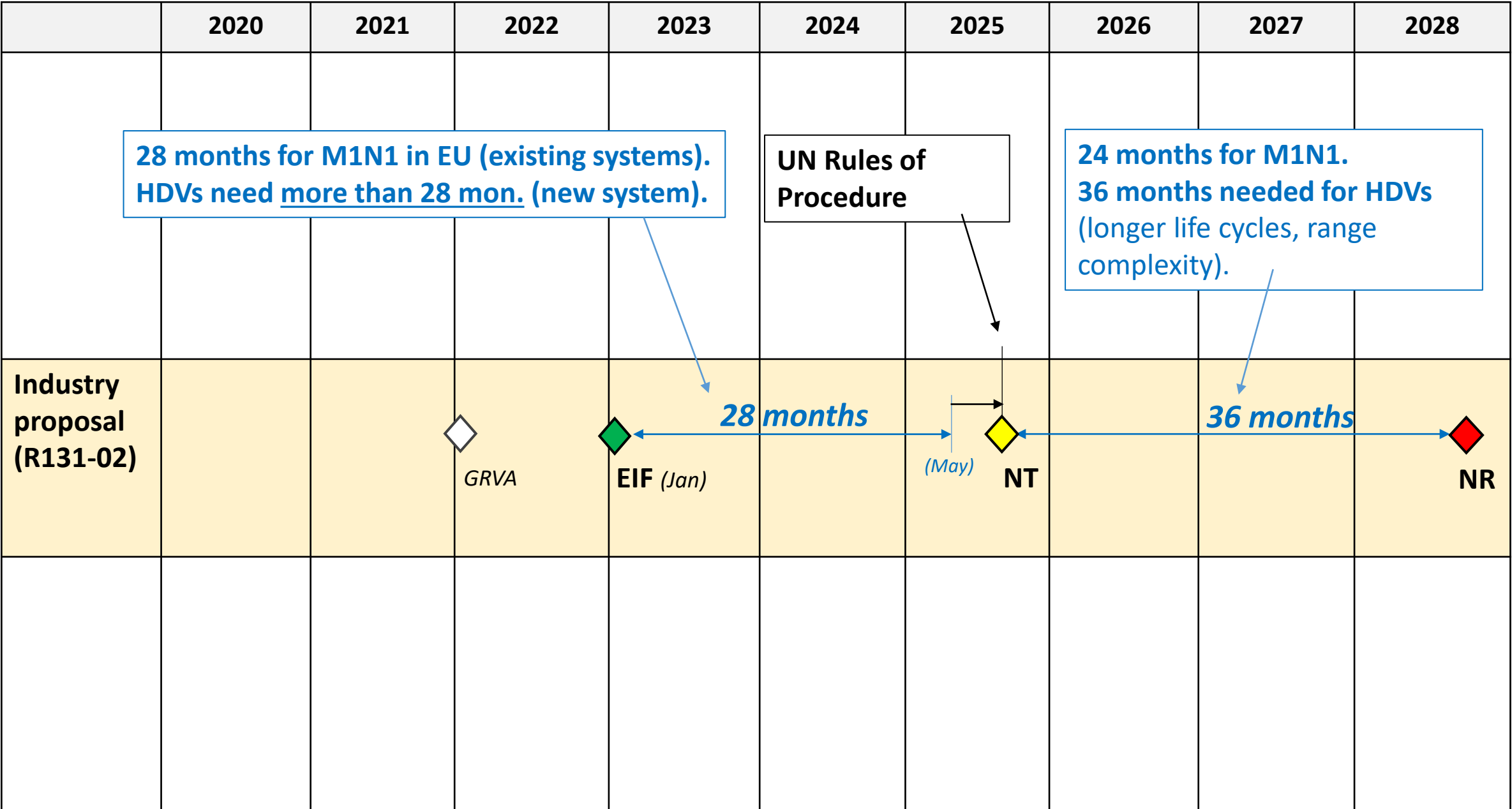
# UN R131 Revision

## Transitional provisions

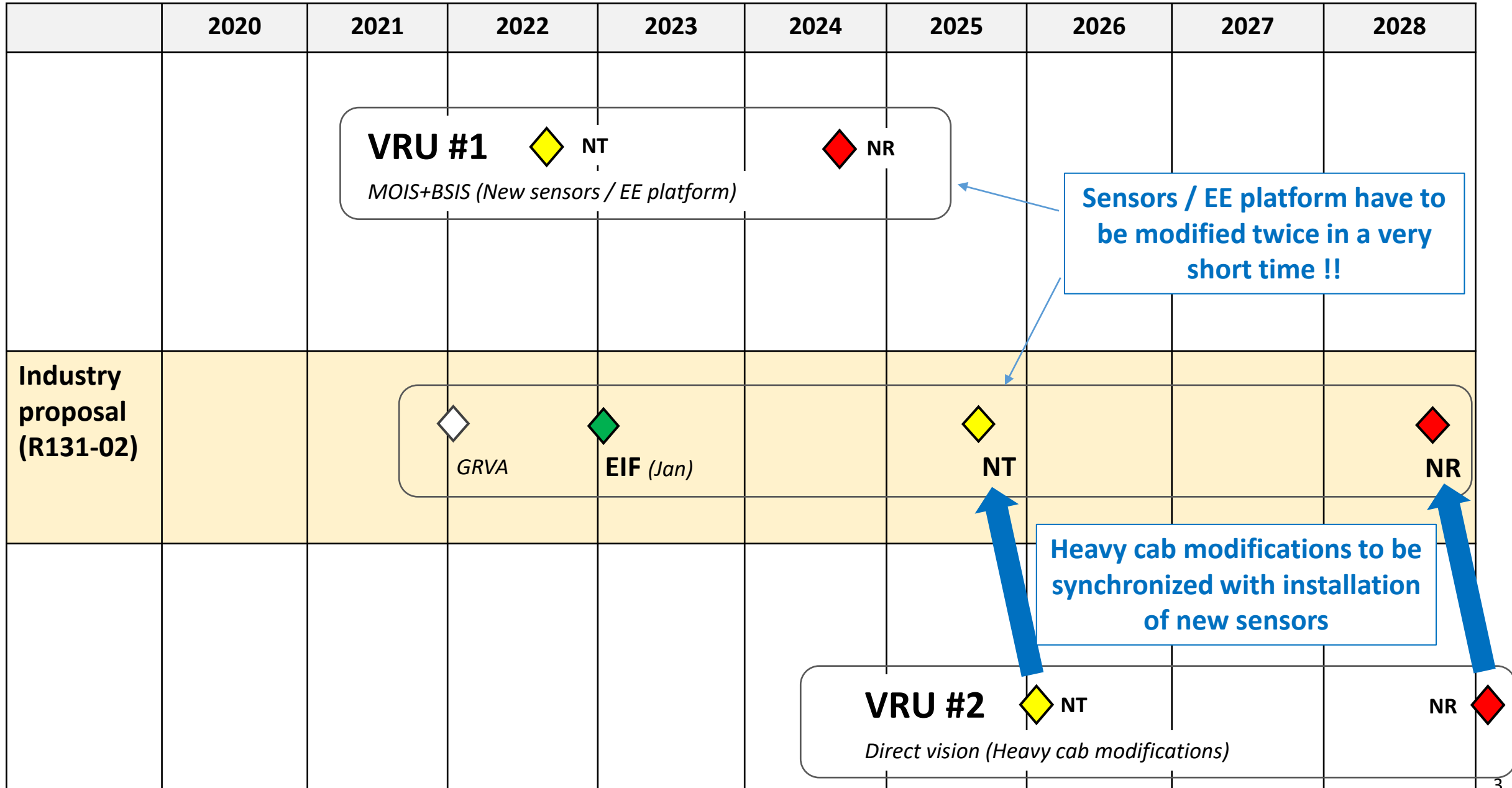
Industry input to GRVA-12

January 24-28, 2022

# How industry built their proposal



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# A two-steps application will not help... for two main reasons:

## **#1** - Anticipating V2V application is technically not realistic because R131 revision is not V2V state of the art:

- Some high end vehicles already fulfil (most of) the new performance on a test track.
- Yet this does not mean all vehicles fulfil current regulation (e.g. LCV, Medium Duties, constructions etc.)
- Many vehicles will need the add-on of a camera (currently only equipped with radar sensors)
- Same performance for stationary target as for moving is a challenge
- New conditions where performance is expected
- New HMI is required for all vehicles (deactivation strategy, information about system initialization)
- New test procedure and updated CEL Annex has to be applied



**Proposed dates by industry are our best to cover such a variety of vehicles**



# A two-steps application will not help... for two main reasons:

## #2 - A two-steps application will make the situation worse with regard to economy and resources

- Modify product twice in a short time span has huge consequences, in a very busy period with new regulations, especially around VRUs which would then be targeted **4 times between 2022 and 2029 !**
- Modifying the product twice in such a short time means doing twice:
  - ✓ Product modification, installation (HW, SW), test (simulation, vehicles), specification, documentation, certification...
  - ✓ Supplier contracts, parts ordering, logistics...
  - ✓ After-market and industrial modifications
  - ✓ Supporting functions (project management, quality, internal and external audits etc.)



**Cost / investments are drastically increased**  
**Lack of resources \***

*\*/ e.g. in the GSR2 landscape, industry already have 4 application steps; 1 step every two years until ~2029*

# Backup slides

# How industry built their proposal

