

OICA Comments

DRAFT Proposal regarding Uniform provisions for periodical technical inspections of accident emergency call systems

(Reference: GRSG-123-12)

Vehicle manufacturers welcomes the revised proposal from IWG-PTI (GRSG-123-12).

Please find OICA comments on the draft proposal:

(A) UN-R144 as a basis of deriving PTI requirements

We foresee an absolute need for clarification of these important items beforehand and adopt the draft proposal and in many context, review of this proposal by GRSG experts is necessary for appropriate guidance.

1. eCall (AECS) PTI provisions laid out in EU cannot be taken vis-a-vis for purpose of PTI requirements for regulations made under 1958 agreement.
eCall in EU is regulated via (EU) 2015/758. The eCall functionality needs to be tested with regard to contact with PSAP and needs compatible infrastructure. We do not see this compatible infrastructure existing in majority of UN contracting parties. Therefore, only requirements standardized via regulations under 1958 agreement, shall be included in the rules under 1997 agreement. Therefore, if such arrangements of self-test with a display is specified in UN-R144, in this case only this display shall be sufficient as a read out for the PTI.

UN-R144, Amendment 1:

Cl. 26.5.3. A warning signal shall be provided in case of AECS internal malfunction. Visual indication of the AECS malfunction shall be displayed while the failure is present. It may be cancelled temporarily, but shall be repeated whenever the ignition or the vehicle master control switch is being activated (whichever is applicable)."

2. As per UN-R144, it is clearly stipulated that the regulation do not applies for Periodical Technical Inspection (PTI) Cl. 1.2(d). Therefore, from procedural view point, we are unable to understand how at this stage, AECD (Accident Emergency Call Device) can be applicable for Periodical Technical Inspection.
3. UN-R144 excludes certain vehicles from the scope of AECD requirements, such as vehicles:
 - a) In the scope of neither UN Regulation No. 94 nor UN Regulation No. 95 and not fitted with an automatic triggering of an AECS;
 - b) Of category M1 with a total permissible mass above 3.5 t; and
 - c) Armoured vehicles

Therefore, the scope of this proposal needs to take into account the stated requirements stipulated in applicable UN-R144 revisions and series of amendments.

(B) Proposed amendments in respective sections of draft proposal

1. Scope

1997 Agreement needs to be specified clearly and the requirement shall apply to vehicles with a design speed exceeding 25km/h .

- 1.2. Wheeled vehicles as defined in paragraph 2.4 used in international transports shall satisfy the requirements set out below;
- 1.3. Contracting Parties may decide to extend the requirement of paragraph 1.2 above also to vehicles used in domestic transport.

This sentence binds to meet the requirement of this rule in International Transports.

eCall reception / functionality in different countries for e.g., Russia, Turkey, EU, etc. are based on different configurations and PSAP communication setups (for e.g., ERA GLONASS, GALILEO, Local SIM, Roaming contracts, etc.).

Mandating such requirements goes beyond the scope of UN-R144 and national sovereignty. Therefore wheeled vehicles used in international transports shall be removed from the scope.

2. Definitions

Scope of vehicle categories stipulated in Cl. 2.9 (M1 & N1) is aligned now with Un-R144. However, certain vehicles are also exempted in UN-R144.

Therefore, OICA recommends to align the vehicle categories as stipulated in UN-R144 revisions and series of amendments or simply make reference to UN-R144 to avoid any uncertainty.

3. Method of Inspection

“ Where a method of inspection is given as visual, it means that in addition to looking at the items, the inspector can also use, where made possible the technical characteristics of the vehicle and where the necessary data is made available, electronic interface.”

ANNEX clearly describes the method of inspection as stated above. Therefore, we see this reference again as redundant and shall be removed.

On the contrary and as stipulated in UN-R144, Cl. 26.5.3, a warning signal is provided in case of AECS internal malfunction. Visual indication of the AECS malfunction is displayed while the failure is present.

Principally, this is a simplified way to conduct PTI check for eCall system malfunction.

We understand that authorities are concerned on MIL manipulation. This can be resolved in future by the adoption of technical requirements of ISO 20730 Part 1, 2 & 3 which requires vehicle functional check only if diagnosis is not successful.

4. Main reasons for rejection and assessment of defects

OICA recommends to carry over defects criteria inline with EU 2014/45 for the purpose of harmonization.

OICA Suggestion to replace current definitions with following:

Deficiencies that are found during periodic testings of vehicles shall be categorised in one of the following groups:

- (a) minor deficiencies (MiD) having no significant effect on the safety of the vehicle or impact on the environment, and other minor non-compliances;
- (b) major deficiencies (MaD) that may prejudice the safety of the vehicle or have an impact on the environment or put other road users at risk, or other more significant non-compliances;
- (c) dangerous deficiencies (DD) constituting a direct and immediate risk to road safety or having an impact on the environment which justify that a Member State or its competent authorities may prohibit the use of the vehicle on public roads.

A vehicle having deficiencies falling into more than one of the deficiency groups referred to in paragraph 2 shall be classified in the group corresponding to the more serious deficiency. A vehicle showing several deficiencies within the same inspection area as identified in the scope of the test referred to in point 2 of Annex I, may be classified in the next most serious deficiency group if it can be demonstrated that the combined effect of those deficiencies results in a higher risk to road safety.
