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## **Questions to GRBP according to ECE/TRANS/WP.29/GRBP/2022/4 and GRBP-75-37 (Monitoring phase of RD-ASEP from 1 July 2023)**

This document has been prepared by the experts of OICA with the aim to clarify the intended monitoring on RD-ASEP as decided during last GRBP 75<sup>th</sup> session and as laid down by the transitional provisions adopted with GRBP-75-37

### **I. Background**

1. Report of 75th GRBP:

*“GRBP also addressed another proposal by IWG ASEP that introduced **Real Driving Additional Sound Emission Provisions (RD ASEP) as a preliminary test procedure for the purpose of collecting experience on the new test and evaluation concept.** (ECE/TRANS/WP.29/GRBP/2022/4). GRBP adopted this proposal, as amended by GRBP-75-37, and requested the secretariat to submit it for consideration and vote at the June 2022 sessions of WP.29 and AC.1 as a new Supplement to the 03 series of amendments to UN Regulation No. 51.”*

The documents have been agreed at the June 2022 session of WP.29 and AC.1.

2. Transitional Provisions (Paragraph 5.1.1.) in GRBP 75-37 and ECE/TRANS/WP.29/GRBP/2022/4:

*“**Starting from 1 July 2023 and for a period of twelve months, during type approval of a vehicle, measurements in accordance with Annex 9 (RD-ASEP) shall be performed. The test results shall be communicated to the Type Approval Authority in the format according to the test report sheet of Appendix 5 in Annex 9.***

*For the purpose of type approval, it is not mandatory to comply with the provisions of Annex 9.*

*For vehicles with PMR not exceeding 60, the performance of RD-ASEP tests is not mandatory.*

*RD-ASEP tests are not applicable to any tests done for the purpose of extension of existing approvals according to UN Regulation No. 51.*

*In case the type approval tests of Annex 3 and Annex 7 were carried out in an indoor facility, the test and the delivery of data according to Annex 9 are not mandatory.”*

3. GRBP had requested OICA to organize the monitoring.

GRBP IWG on RD-ASEP had originally the idea that the data collection should be done by the UN secretariat. However, the UN secretariat pointed out, not to be in the position to receive such data. During GRBP the request was made towards OICA to collect the monitoring data.

OICA has discussed this request internally with its members with the outcome that OICA can be the platform where monitoring data can be sent to.

However, there are more aspects which OICA asks GRBP to consider, and to decide how to proceed:

### **II. Questions to GRBP**

4. **Who is responsible for monitoring data gathered during a type-approval process?**  
The approval authority, technical service or the manufacturer applying for approval?

5. **Who shall send the data? How often shall it be sent (‘continuously’ or ‘by packet’)?**

While it is quite common that OICA collect data from manufacturers, such data collection is typically on a voluntary basis. There is no legal way that OICA can oblige manufacturers in submitting data. If data are to be sent by Authorities, we do not know whether this path is legally correct.

6. **Are the data already anonymous when sent to OICA? Who will check the quality of the submitted data?**

Data should be anonymous when sent to OICA for competition law reasons. Anonymization of the fields of the given table from Annex 9 should be done by the licensing authority or technical service according to predefined specifications.

However, data will need a completeness and consistency check, for which it would be convenient, if contact can be made directly to the data owner.

In the past, independent consultants have taken that role. OICA suggests, that this path should be used again.

7. **Data Analysis.**

OICA itself is not in a position to perform any analysis of the data. On behalf of OICA, ACEA has started to draft a research program to

- prepare a data entry sheet for delivery of RD-ASEP relevant data
- collect and review data (completeness, consistency)
- provide a questionnaire for technical services and manufacturers on experiences gained during the monitoring phase
- aggregate all data in a database
- analyse the data
- provide a report on findings including feedbacks from technical services and manufacturers
- provide recommendations for RD-ASEP fine tuning if needed

8. **Who is willing to join this research program?**

If a monitoring is fully based on industry processes, there could be concern regarding a potential bias in data. OICA suggests that CPs join this study program, so that the monitoring can be rated as neutral in front of the public.