

Proposal for the introduction of uniform provisions on accuracy and anti-tampering for mileage and odometers in UN Regulation No. 39

1. Background

In 2013 GRSG started to discuss the mandatory installation of an odometer in vehicles. This was followed by considerations on adding accuracy provisions and anti-tampering measures in 2015. GRSG agreed during its 108th session in May 2015 on the mandatory fitment of an odometer in vehicles. The 01 series of amendments to UN Regulation No. 39 regulating this, entered into force on 18 June 2016.

Considerations on accuracy provisions and anti-tampering measures continued but in 2016, experts at GRSG assumed that the issue would be resolved by the newly established ITS/AD group, considering a broader concept of measures against cyber security and tampering. The ITS/AD, and successive groups, deployed many activities, resulting in the development of UN Regulations on Cyber Security and Software-Updates, but did not develop specific measures as regards odometers, hence leaving the issue unresolved.

2. Accuracy and anti-tampering measures for mileage values needed

Mileage values and in particular odometer readings are used for many important applications:

1. The mileage ('distance travelled') is a value used by UN Regulations and national level requirements for various purposes, e.g. in relation to durability, emissions, CO₂ and fuel consumption, incl. OBFCM, ISC and RDE.
2. Odometer readings are essential to evaluate the roadworthiness of a vehicle. Overdue maintenance poses serious safety and environmental risks.
3. Odometer readings are an important parameter for valuation of vehicles during sales, for accountability in taxation, calculating VAT and registration taxes, warranty, insurance premiums and rental and lease rates.
4. A number of other applications exist, or are under consideration, at national level, e.g. in relation to periodic roadworthiness testing, to calculate the CO₂ footprint of businesses or to levy road tax based on mileage values stored in vehicles, notably odometer readings.
5. In the EU, odometer readings are already frequently registered and internationally exchanged.

Due to current and potential future use of mileage values, regardless if odometer readings are used or that it is based on the same data source that the vehicle odometer uses, it is essential to ensure that mileage values are reliable and robust.

3. Proposal

The Netherlands invites GRSG to consider exploring possibilities for ensuring reliable and robust mileage values as generated by and stored in vehicles (and/or elsewhere). In particular, we request to consider the introduction of uniform provisions on:

1. accuracy of mileage values stored in vehicles (a maximum tolerance and type-approval test procedure),
2. anti-tampering for (to prevent manipulation of) mileage values stored in vehicles,
3. accuracy and anti-tampering of mileage values as displayed by the odometer.

GRSG may wish to consider establishing a task force to develop these uniform provisions.
