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## Draft proposal for a GRSG Task Force on UN Regulation No. 39 covering mileage values

### I. Terms of Reference

1. In accordance with ECE/TRANS/WP.29/GRSG/104 (report of the Working Party on General Safety Provisions on its 125th session), Paragraph 49: the Task Force (TF) shall develop a draft regulatory proposal to amend UN Regulation No. 39, or any other regulatory proposal, with regard to speedometer and odometer equipment including its installation, in respect of mileage values processing. In particular, it shall develop uniform provisions on:

- (a) accuracy of the on-board odometer mileage values in vehicles and develop a maximum tolerance and type-approval test procedure accordingly,
- (b) security management and anti-tampering, to prevent and/or detect, to the greatest extent possible, manipulation of the on-board odometer mileage values in vehicles,
- (c) accuracy, security management and anti-tampering of the odometer mileage values displayed to the driver.

The TF shall take into account that mileage values may be transferred and stored off-board and explore potential associated provisions.

The task force will explore the possibility for self-check and external check (enforcement).

2. When developing the regulatory proposal(s), the TF should take into account existing technology, data and research. Furthermore, it should consider pre-existing standards as well as national and international legislation covering the same scope.

3. The TF shall focus on vehicles of categories MN taking into consideration vehicles equipped with measures to protect security e.g. tachographs.

~~The TF may, at a later stage, consider the relevance of addressing the vehicles of category L.~~

The TF shall also consider accuracy requirements for vehicles of category L at an appropriate timing.

4. The target completion dates for the work of the TF shall be:

- (a) accuracy of the on-board odometer mileage values: official document for the 128<sup>th</sup> session of GRSG (October 2024) for M, N (and L at appropriate timing)
- (b) anti-tampering of the on-board odometer mileage values: official document for the 128<sup>th</sup> session of GRSG (October 2024) for MN
- (c) accuracy and anti-tampering of the odometer mileage values displayed to the driver: official document for the 128<sup>th</sup> session of GRSG (October 2024).

The TF may deliver provisions at a later date for MN equipped with measures to protect security e.g. tachographs

5. The adoption process remains under the responsibility of GRSG, WP.29 and AC.1 in line with the administrative procedures as defined in the 1958 Agreement.

The TF is expected to take into account the work performed by other Working Parties subsidiary to WP.29 and by WP.15.

## II. Rules of Procedure

1. The TF is a subsidiary body of GRSG and is open to all Contracting Parties to the Agreements administered by WP.29, vehicle manufacturers and their suppliers, Technical Services and the participants of all Working Parties (GRs) subsidiary to WP.29.

Additional experts may attend on a case-by-case basis, invited per a consensual decision of the TF. These experts shall not be part of the decision process.

2. A Chairman and a Secretary will manage the TF.

(a) The chairmanship shall be under the responsibility of The Netherlands,

(b) The secretariat shall be under the responsibility of OICA.

3. The working language of the TF will be English.

4. All documents and/or proposals shall be submitted to the Secretary of the TF in a suitable electronic format in advance of the meeting. The TF may refuse to discuss and endorse any item or proposal which has not been circulated 10 working days prior to that meeting.

5. An agenda and related documents will be made available on the website by the Secretary, in advance of all scheduled meetings.

6. Decisions will be reached by consensus. When consensus cannot be reached, the Chair of the TF shall present the different points of view to GRSG. The Chair may seek guidance from GRSG, as appropriate.

7. The progress of the TF will be routinely reported to GRSG – wherever possible as an informal document and presented by the Chair, the Secretary or their representative(s).

8. All working documents should be distributed in digital format. Meeting documents should be made available to the Secretary for publication on the website of WP.29.

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## III. Justification

The accuracy requirements of the [speedometer](#) equipment is the same for M, N and L categories of vehicles. It therefore makes sense to apply the same requirements with regard to the accuracy of the [odometer](#) to all categories of vehicles. In the view of the Netherlands, there really is no justification not to have the same accuracy requirements across the board.

With the introduction of the 01 series of amendments to UN R39, the odometer was mandated for all vehicle categories M, N and L. The intention was not just to mandate a 5 or 6-digit display that may not even work or work unreliably, thus not being effective or usable for the use cases mentioned in document [GRSG-125-05](#).

For some L category vehicles, we still see mechanical speedometer/odometers on the market for which it will be a challenge to comply with anti—tampering requirements.

At the moment, no data are available indicating a particular issue with tampering of odometers on L-category of vehicles. Therefore, also considering the fact that currently most L-category vehicles are not within the scope of UN Regulation 155 and 156, and considering the potential cost-benefit balance for introducing anti-tampering requirements on these vehicle categories, it is considered not a priority at this moment by the Task Force.

Therefore this proposal aims at looking at the possibility to develop and align accuracy requirements only at this stage for L-category vehicles.