

Submitted by the leadership of the
Workshop on the implementation
of UN R155&156

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18th GRVA 22-26 January 2024
Provisional agenda item 5(a)

Report of the 16th workshop on UN R155 & 156

Presented at the 18th GRVA, 22 - 26 January, 2024

Meetings

Since the 17th session of GRVA:

16th Workshop, held in person in Geneva
On 11th -12th January 2024

Discussion Items

1. GNSS and related issue (CSMS Scope/Assessment)
2. Reporting provision (CSMS Scope/Assessment)
3. RxSWIN (Software Update)
4. Recertification of CSMS/SUMS (Homologation process)
5. Software Updates for post-registration (Software Update)
6. Reference to R155 in other Regulations
7. Boundary of MS (Joint project/ issues for countries not to adopt R155/156)
8. PTI (R155 does not restrict national actions in aftermarket incl. PTI.)

1. GNSS and related issue (CSMS Scope/Assessment)

Report to IWG:

If the Threat Analysis and Risk Assessment (TARA) determines that risk is negligible, then there is no need to mitigate against GNSS spoofing (as per other threats).

The regulation does not mandate the use of cryptographic solution as a method for authentication to mitigate GNSS spoofing and that manufacturers are free to utilise other methods if they offer equivalent protection.

2. Reporting provision(CSMS Scope/Assessment)

- A manufacture holding a CoC for a CSMS, but for which no type approval pursuant to UN R155 has been granted must produce an annual report.
- Expectation will be the report to cover both MS processes and vehicle type if any.
- Event relevant to 7.2.2.2. (g) and 7.4.1. is the subject of “reporting provision” as basis. But wider issues may be reported.

3. RxSWIN (Software Update)

- Question – Should the principle be that RXSWIN should be obligated in other system regulations as per R.157?
- It is noted that special attention is required by the authorities for identifying relevant software version(s) if no RxSWIN exists.
- Workshop would like to remind that WP.29 has already recommended that GRs should consider whether to implement the concept of RXSWIN. This obligation would be done through Annex 7 of RE.3.

4. Recertification of CSMS/SUMS

- Workshop agrees that the recertification after the 3 years period should be done to the same degree as the initial audit.

5. Software updates for post registration

- Will note in status report to GRVA some of the issues and continue to consider the problem.
- Suggestion to highlight to WP.29 via GRVA the challenge with IWVTA and software updates. Could be supported by a one-pager with some examples and impact under the 1958 Agreement.

6. Reference to UN R.155

- Agree to copy into Q&A table the following:
 - If the relevant function, such as digital key in the case of UN R116, is explicitly included and considered by the technical service in the UN R155 approval, no additional testing is required.
 - For system approvals not just the architecture of the system subject to the system regulation (e.g. UN R116) needs to be considered but also in context of the complete vehicle architecture.
- GRSG may be requested to review the texts about 'compliance' with UN R.155 (utilise wording as per UN R.157) to amend UN Rs.116, 161, 162 & 163.

7. Boundary of MS

- Will have discussion in next workshop about boundary of CSMS and the extent TAA/TS need to consider.
- France to present at next workshop on joint venture CSMS and their practical application of that.

8. PTI

- Agreed that as UN R.155 is without prejudice to national and regional law, necessary legal access to vehicle data should not be prevented. (para 1.3. of UN R.155)
- Discussion at the workshop noted that the statement above should not be interpreted as the disclosure of information about EE architecture to third parties.