

Proposal by OICA to amend document ECE/TRANS/WP.29/GRSG/2024/36 to indicate the Manufacturers' needs regarding the changes to UN R39. The modifications to the text of document ECE/TRANS/WP.29/GRSG/2024/36 are marked in highlighted red characters.

I. Proposal

Paragraph 5.1., amend to read:

- 5.1. An onboard speedometer and odometer complying with the requirements of this Regulation shall be fitted to the vehicle to be approved. ~~If more than one onboard speedometer or odometer is fitted to the vehicle, all these speedometers and odometers shall comply with all the requirements of this Regulation. all these speedometers and odometers shall comply with all the requirements of this Regulation. Additional graduations and numerical values are not permitted. [Tachographs or Recording equipment, or Tachograph Replacement Units are not considered to be an on board speedometer or odometer for the purpose of this paragraph.]~~

OICA proposal

...If more than one onboard speedometer or odometer is fitted to the vehicle, at least one of these speedometers or odometers shall comply with all the requirements of this Regulation.

Paragraph 5.8., amend to read:

- 5.8. The total distance indicated shall not deviate by more than **[±5.0]** per cent from the true distance travelled as determined in paragraph 5.7.

Paragraph 10.6., amend to read:

- "10.6. As from 1 September **[2030]**, Contracting Parties applying this Regulation shall not be obliged to accept type approvals to any of the preceding series of amendments, first issued after 1 September **[2030]**."

Paragraph 10.7., amend to read:

- "10.7. Until 1 September **[2033]**, Contracting Parties applying this Regulation shall accept type approvals to **[any of]** the preceding series of amendments, first issued before 1 September **[2030]**."

Paragraph 10.8., amend to read:

- "10.8. As from 1 September **[2033]**, Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued to any of the preceding series of amendments to this Regulation."

II. Justification

1. OICA proposes to remove the speedometer double indication item from the task-force proposal since this topic is more complex than expected and the paragraph proposed was not discussed during the task-force meetings.

OICA proposes to separate that topic from the odometer mileage issue and the present document proposes an alternative wording on double indication as a basis for further discussions.

2. Paragraph 5.8.: The TF again considered an appropriate tolerance value for the allowed deviation of the mileage value as displayed by the odometer with the true distance driven by the vehicle during the Annex 4 type-approval test procedure. No consensus was reached. OICA and IMMA position is $\pm 5.0\%$ that would be appropriate, mainly due to tyre tolerances. This was demonstrated by document TF-R39MV-06-04.

3. Paragraphs 10.6.-10.8.: “any of” added to paragraphs 10.6. and 10.8. (and under consideration for 10.7.) to ensure it is understood that this concerns all previous series of amendments. This is in line with the ‘General Guidelines for United Nations regulatory procedures and transitional provisions in UN Regulations’ (ECE/TRANS/WP29/1044/Rev.3), as last amended by ECE/TRANS/WP.29/2024/76.

The dates remain bracketed. While some Contracting Parties favour a swift introduction due to national applications or for being able to refer from their national law (e.g. emission requirements) to this UN Regulation No. 39 Amendment 2, industry is of the position that a later introduction time is needed for technical implementation (2030 vs. 2027 and 2033 vs. 2028). Especially the malfunction indication for existing vehicle types needs more time, according to industry.

Vehicle manufacturers need more time

- to implement the malfunction indication, a new generation of ECU or hardware/software modification must be developed then validated.

- Some manufacturers recently developed and implemented a new generation of ECU and electronic architecture to fulfill the latest cyber security requirements, this generation of ECU must last as long as possible.

- To implement these new requirements on vehicle with long lifetime (M2M3N2N3)

- to implement speedometer double indication requirement (if any changes), every software modification must be carefully re-developed than validated.

The tyre Industry will be heavily impacted by the proposed modifications and the tyre manufacturers shall need to study the impact of odometer accuracy on their own production.

Vehicle manufacturers request GRSG to contact GRBP for a new or updated regulation on tyre dimension, rolling circumference with requirements on accuracy.

We ask the secretary of GRSG to clarify the squared wording [if any] in 10.7 regarding the consistency with previous series of UN-R39.