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### Economic Commission for Europe

#### Inland Transport Committee

#### World Forum for Harmonization of Vehicle Regulations

#### Working Party on Brakes and Running Gear (GRRF)

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Item 3(d) of the provisional agenda

#### Regulations Nos. 13 and 13-H (Braking)

### **Proposal for Supplement 10 to the 11 series of amendments to Regulation No. 13**

#### **Submitted by the expert from the European Association of Automotive Suppliers \***

The text reproduced below was prepared by the expert from the European Association of Automotive Suppliers (CLEPA) proposing modifications in the definition of the responsibilities for approval requirements.

The modifications to the existing text of the Regulation are marked in bold for new or strikethrough for deleted characters.

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\* In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106 and ECE/TRANS/2010/8, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

## I. Proposal

*Paragraph 1.1.2.1. of Part 2 to Annex 19, amend to read:*

"The **vehicle manufacture** / system manufacturer shall supply..."

*Paragraph 1.1.3.1. of Part 2 to Annex 19, amend to read:*

"...defined in the **vehicle manufacturer's** / system manufacturer's information document.... ...paragraph 2.1. of the **vehicle manufacturer's** / system manufacturer's information document."

*Paragraph 1.1.3.2. item (s) of Part 2 to Annex 19, amend to read:*

"(s) ...be carried-out using **vehicle manufacturer** / system manufacturer test data..."

*Paragraph 1.1.3.2. item (t) of Part 2 to Annex 19, amend to read:*

"(t) ...covered in the ~~system manufacturer's~~ information document..."

*Paragraph 1.1.3.2. item (u) of Part 2 to Annex 19, amend to read:*

"(u) ...covered in the ~~system manufacturer's~~ information document..."

*Paragraph 1.1.3.2. item (x) of Part 2 to Annex 19, amend to read:*

"(x) ...utilising **vehicle manufacturer's** / system manufacturer's test data..."

*Paragraph 1.1.3.2. item (y) of Part 2 to Annex 19, amend to read:*

"(y) ...installation envelop as ~~specified by the system manufacturer~~ to be evaluated;"

*Paragraph 1.1.3.2. item (z) of Part 2 to Annex 19, amend to read:*

"(z) ...installation envelop as ~~specified by the system manufacturer~~ to be evaluated."

*Paragraph 1.1.4.1. of Part 2 to Annex 19, amend to read:*

"...agreed upon between the **vehicle manufacturer** / system manufacturer and the Technical Service..."

*Paragraph 1.1.4.1.10. of Part 2 to Annex 19, amend to read:*

"...to confirm the installation envelop specified by the **vehicle manufacturer** / system manufacturer."

*Paragraph 1.1.4.1.11. of Part 2 to Annex 19, amend to read:*

"...to confirm the installation envelop specified by the **vehicle manufacturer** / system manufacturer."

*Item 1.1. of Annex 19 Appendix 11*, amend to read:

"Name of **vehicle manufacturer** / system manufacturer"

*Footnote 1 of Annex 19 Appendix 12*, amend to read:

"**Vehicle manufacturer** / system **manufacturer** test data..."

## II. Justification

1. It is appropriate that a system manufacturer is able to initiate a test report in conjunction with a technical service, otherwise the use of the Annex 19, Part 2 procedure is restricted to large motor vehicle manufacturers.
2. Motor vehicle manufacturers in the small and medium enterprise (SME) category do not have the resources to carry out the work that is necessary in generating a test report in accordance with Annex 19, Part 2 – the testing of a wide range of vehicles to cover the 20 items that need to be evaluated under both low co-efficient of adhesion conditions (e.g. winter testing in Sweden or Finland) and high co-efficient of adhesion conditions (e.g. summer testing in France or Germany). SME's are, therefore, discriminated against unless a system manufacturer is able to carry-out this work.
3. A system manufacturer is able to carry-out this work on the basis that a wide range of vehicles are available during the validation and application engineering phases and by anticipating future demand for the system.
4. Therefore, it should be possible for a system manufacturer to have a technical service generated test report in accordance with the technical requirements of Annex 19, Part 2 without involving a motor vehicle manufacturer.
5. To achieve and to clarify that a motor vehicle manufacturer may also use the Annex 19, Part 2 procedure, regardless of whether to the motor vehicle manufacturer is also a system manufacturer, the following amendments are proposed:
  - (a) As clarification that the vehicle manufacturer can initiate a test report, whether or not the vehicle manufacturer is also the system manufacturer, the wording "vehicle manufacture" is combined with "system manufacturer" (paragraphs 1.1.2.1., 1.1.3.1., 1.1.3.2.(s), 1.1.3.2.(x), 1.1.4.1., 1.1.4.1.10., 1.1.4.1.11. of Annex 19, Part 2 and paragraph 1.1. of Annex 19 Appendix 11).
  - (b) In the case where there is no benefit in combining vehicle manufacturer with system manufacturer, system manufacturer is deleted to simplify the text (paragraphs 1.1.3.2.(t), 1.1.3.2.(u), 1.1.3.2.(y) and 1.1.3.2.(z) of Annex 19, Part 2).
  - (c) In footnote 1 to Appendix 12 of Annex 19, vehicle manufacturer is added and system supplier is change to system manufacturer to maintain consistency.