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| Submitted by the expert from the Russian Federation | Informal document **GRE-73-20**  (73rd GRE, 14 - 17 April 2015,  agenda item 7(c))  English |

**Comments on ECE/TRANS/WP.29/GRE/2014/41**

The text reproduced below contains proposals for amendments to additional safety prescriptions for electromagnetic compatibility of trolleybuses presented in ECE/TRANS/WP.29/GRE/2014/41.

Proposal submitted by the expert from Belgium includes prescriptions for broadband emission limits of the trolleybus in stationary and dynamic mode at the frequency ranges: 9KHz - 1000МHz, divided into sub-ranges (9 – 150) KHz, (150KHz – 30МHz) and (30 – 1000) МHz and establishes trolleybus’s test methods in stationary and dynamic mode at the speed range of 15 до 25 кm/h.

In accordance with the Technical Regulation of the Customs Union "On the safety of wheeled vehicles" TR CU 018/2011 (which is mandatory at the territory of the Russian Federation and the countries of the Customs Union) the requirements of Regulation №10-03 is mandatory for vehicle category M3 in respect of electromagnetic compatibility, as well as additional requirements of GOST 29205-91 "Electromagnetic compatibility of technical means. Man-made noise from electrical transport. Limits and test methods", which applies to trolleybus as a municipal electric transport.

The standard specifies prescriptions for frequency range for vehicle’s broadband emission measurements: 150 KHz to 300 MHz, divided into sub-ranges (150 KHz - 30 MHz) and (30 - 300) MHz, and establishes test methods in the steady dynamic mode at a speed of 30 - 40 km/h and transient regimes of dynamic mode (start, electric braking, load shedding). The broadband emission limits prescribed in the standard are significantly different from the values proposed in the document ECE/TRANS/WP.29/GRE/2014/41 (for the same sub-ranges of frequency).

Taking into account the above mentioned, the following proposal for GRE decision concerning the including in the Regulation № 10 additional requirements in respect of electromagnetic compatibility of trolleybuses: to amend the proposals submitted by the expert from Belgium (ECE/TRANS/WP.29/GRE/2014/41) in respect of broadband emission limits considering the requirements of the Russian Federation and the Customs Union. It is also necessary to develop and include in the Regulation № 10 prescriptions concerning the test methods of trolleybuses in respect of electromagnetic compatibility, including requirements for test area with connection to the trolleybus network.

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