Submitted by the expert from OICA

Informal document **GRSG-114-35**
(114th GRSG, 9-13 April 2018
agenda item 11.)

Proposal for amendments to UN Regulation No. [144] (document ECE-TRANS-WP29-2017-132 on Accident Emergency Call Systems)

The text reproduced below was prepared by the expert from OICA to correct the scope of the AECS regulation. The modifications to the current text of UN Regulation No. [144] are marked in bold characters for new and strikethrough for deleted characters.

I. Proposal

Paragraph 1.2, amend to read (addition of two new sub-item (f) and (g), rest is present for best readability):

"1.2. It does not apply to:

(a) communication …

…

(d) … Inspection (PTI);

(e) automatic triggering of AECS in case of vehicle rollover.

(f) automatic triggering of AECS in case of vehicle frontal impact of vehicles of category M_1 in the scope of UN Regulation No. 94 and not equipped with triggered frontal restraint systems"

(g) automatic triggering of AECS in case of vehicle lateral impact of vehicles of category M_1 in the scope of UN Regulation No. 95 and not equipped with triggered lateral restraint systems"

Paragraph 1.3 (c), amend to read (addition of a new sub-item (f), footnote remains unchanged, rest is present for best readability):

1.3. Vehicles,

(a) in the scope of neither UN Regulation No. 94 nor UN Regulation No. 95 and not fitted with an automatic triggering of a AECS;

(b) of category M_1 in the scope of UN Regulation No. 94 and not equipped with frontal airbag;

(c) of category N_1 in the scope of UN Regulation No. 95 and not equipped with side airbag;

(d) of category M_1 with a total permissible mass above 3.5 t; and

(e) armoured vehicles[1]

(f) of category M_1 in the scope of UN Regulation No. 95 and not equipped with airbag

shall be excluded from the scope of this Regulation.

1.4. Global …

…

1.5. … the Contracting Parties apply."

II. Justifications

1. From 2013 through 2016 GRSG gave delegation to an informal group on Accident Emergency Call Systems (AECS) to elaborate a draft new regulation on AECS, to be annexed to the 58 Agreement. This informal finalized its work in 2016 and the outcome was tabled and adopted at the 173rd session of WP29 in November 2017 as document ECE/TRANS/WP29/2017/132. The draft regulation is expected to enter into force in July 2018, as UN R[144].

2. The group agreed that the regulation should not apply to the triggering of AECS in case of roll-over because the equipment identifying the roll-over scenario is not the same as that identifying an impact, and because no reliable roll-over test protocol was existing at that time. The group however omitted to address two cases similar to roll-over, i.e. the case of a frontal (resp. lateral) impact of a vehicle not equipped with frontal (resp. lateral) triggering system. The addition of the sub-items (f) and (g) in paragraph 1.2. aims at addressing those two cases.

3. The approach of the regulation is such that only the vehicles fitted with airbags should be fitted with AECS since the airbag deployment is considered as an evidence of the existence of an automatic trigger in the vehicle for initiating an emergency call. As a logical consequence, the vehicles not fitted with an airbag should not be regulated with regard to their AECS. Following this logics, the informal group on AECS agreed to align the scope of the regulation on those of UN R94 (frontal impact) and UN R95 (side impact), but letting aside those vehicles within the scopes of these passive safety regulations but not equipped with airbags. This is one of the purposes of the paragraph 1.3. in the AECS text.

4. However it appears that the AECS informal group erroneously “forgot” that the vehicles of category M1 are also included in the scope of UN R95. As a consequence, the vehicles of category M1 in the scope of UN R95 and not fitted with a side airbag should also be out of the scope of UN R[144].

5. It was certainly not the intention of the informal group to exclude the vehicles of category N1 without airbag and at the same time ignore/forget to exclude the vehicles of category M1 without airbag.

6. The proposal is now to correct this error by adding a sub-item 1.3.(f) clarifying that the vehicles mentioned above should remain out of the scope of the regulation.
