

Japanese Comment on GRRF/2000/4/rev.1 and 15 proposed by Germany

ECE13/09(GRRF/2000/4/Rev.1)

Insert a new paragraph 4.6. in Annex 13, instead of the proposed German amendment to existing section 4.5.

This paragraph to read:

Disconnection or change of the control mode of the anti-lock system is permitted when a manual device primarily used for selecting a drive train operation mode is in the mode of differential lock and all-wheel drive. Where such a device is operated, the following conditions must be met:

- the power-driven vehicle with the anti-lock system disconnected or the control mode changed by the device as mentioned above must satisfy all the relevant requirements in Annex 10 to this Regulation;
- an optical warning signal shall inform the driver that the anti-lock system has been disconnected or the control mode changed; the yellow anti-lock failure warning signal specified in paragraph 5.2.1.29.1.2 of this Regulation, may be used for this purpose;
- the vehicle user's handbook provided by the manufacturer should warn the driver of the consequences of disconnection or mode change of the anti-lock system.
- The device as mentioned above may, in conjunction with the towing vehicle, disconnect/change the control mode of the anti-lock system of the trailer. A separate device for the trailer alone is not permitted.
-

ECE13-H(GRRF/2000/15)

Paragraph 4.4. should be amended to read :

Disconnection or change of the control modes) of the anti-lock system is permitted when a manual device primarily used for selecting a drive train operation mode is in the mode of differential lock and all-wheel drive. Where such a device is operated, the following conditions must be met:

- the power-driven vehicle with the anti-lock system disconnected or the control mode changed by the device as mentioned above must satisfy all the relevant requirements in Annex 5 to this Regulation;
- an optical warning signal shall inform the driver that the anti-lock system has been disconnected or the control mode changed; the yellow anti-lock failure warning signal specified in paragraph 5.2.21.1.2 of this Regulation, may be used for this purpose;
- the vehicle user's handbook provided by the manufacturer should warn the driver of the consequences of disconnection or mode change of the anti-lock system.

Justification

Japan is basically in favor of the proposal from Germany because this change in the Regulation(s) will allow improvement in the practical operation of the specialized vehicles equipped with ABS .However we have some comments about the proposal from Germany.

1.

It is believed that the purpose of this proposal is to permit the automatic disconnection or automatic change of mode of ABS if it is linked to the switching of the differential locking function of all wheel drive vehicles.

We feel that, rather than amending the present paragraph, it is better to insert a new paragraph dealing with those vehicles.

2.

The proposed text is concerned with the disconnection /the mode change of ABS. But since it is preferable to retain the normal ABS function at medium and higher speeds , we would prefer to allow the ABS changes to be made only when differential locking and all wheel drive functions are engaged.

3

We are concerned that the automatic reset of the ABS back to the normal operation at ignition switch-on should not mean that the differential locking function should similarly be disconnected at each ignition switch-on. Since this could cause practical traction problems for uphill driving and so on if the engine needs to be restarted. For example the vehicle will make a slip down in some cases. Therefore we think the differential locking function should be retained at ignition switch-on.
