

COMMENTS TO THE DRAFT 03 SERIES OF AMENDMENTS
TO REGULATION No. 10
(Electromagnetic compatibility)

Note: The text reproduced below was prepared by the expert from JASIC. It refers to ECE/TRANS/WP.29/GRE/2006/51 and ECE/TRANS/WP.29/2007/60

A. PROPOSAL

3. Application for Approval

Paragraph 3.2.9., to be deleted:

~~"[3.2.9.] Components sold as aftermarket equipment and intended for the installation in motor vehicles need no type approval if they are not related to immunity related functions (see paragraph 2.12.). In this case a declaration must be issued by the manufacturer that the ESA fulfils the requirements of this Regulation and in particular the limits defined in paragraphs 6.5., 6.6., 6.8. and 6.9.~~

~~During the transition period, ending on 4 November 2008, the person or legal entity responsible for placing on the market of such a product has to submit all relevant information and/or a sample to a Technical Service which will determine if the equipment is immunity related or not. The result of the inspection shall be available within three weeks and not require additional testing. A document according to the example given in Annex 3C shall be issued by the Technical Service within the same period. In case of doubts and if the Technical Service refuses to issue an attestation according to Annex 3C, the manufacturer has to apply for type approval for his product."~~

B. JUSTIFICATION

Under the 1958 Agreement, there is no equivalent Regulation to the EU Directives 89/336/EEC and 1995/5/EC and double testing according to other Regulations is not possible. Japan supports German proposal of the deletion of 3.2.9, ECE/Trans/WP.29/GRE /2006/51 /Amend.1.

Japan is going to resume Reg. No. 10, 03 series of amendments. It doesn't need to adapt an additional EMC regulation to aftermarket equipments, which are not related to immunity related functions also in Japan.

Other Editorial Comments

Clause/ Subclause	Paragraph Figure/Table	Type of comment (General/ Technical/Editorial)	Proposed change	JUSTIFICATION
8.3.1		Editorial	2dB (25%) to 4dB (60%)	2004/104/EC describes 4dB (60%)
Appendix 1 8 Annex 9 1.2.1. Annex 9 4.2.2.		Editorial	(TEM) cell (ISO 11452-3, third edition 2001. to 2 nd edition)	Editorial
Appendix 1 6. Annex 4 4.3. Annex 5 3.3. Annex 6 4.1.1. Annex 7 4.3. Annex 8 4.3. Annex 9 3.2.		Editorial	ISO 17025 (first edition 1999) to ISO 17025 (2 nd edition)	Ineffective of 1st edition
Annex 1	6 th line	Editorial	Nos.10 to No. 10	Editorial
Annex 1	Model A Model B	Editorial	02 2439 to 03 2439	To prevent from misunderstanding
Annex 4 1.2. Annex 4 2.1. Annex 4 3.1. Annex 4 4.2. Annex 4 4.3. Annex 5 1.2. Annex 5 3.3. Annex 7 4.2. Annex 8 4.3.		Editorial	CISPR 12(fifth edition 2005) to CISPR 12(sixth edition 2007)	Sixth edition is available
Annex 6 4.1. Annex 9 3.1.		Editorial	4,600us to 4 600 us	In general numerical description should follow ISO standard. http://www.physics.nist.gov/Document/sp811.pdf
Annex 6 4.1.1. Annex 9 3.2.		Editorial	1,300 MHz to 1 300 MHz	In general numerical description should follow ISO standard. http://www.physics.nist.gov/Document/sp811.pdf
Annex 6 4.1.1. Annex 9 3.1.		Editorial	1,800 MHz to 1 800 MHz	In general numerical description should follow ISO standard. http://www.physics.nist.gov/Document/sp811.pdf
Annex 8 1.1.		Editorial	8 1.1. Annex 4 to 5	
Annex 7 4.1. Annex 8 4.1.		Editorial	A semi anechoic chamber to ALSE method	Due to CISPR 25
Annex 8 4.1.		Editorial	Outdoor test sites to OATS	Due to CISPR 16-1
Annex 9 1.2.1.		Editorial	800 mm Stripline: according to clause 4.5. of this Annex.	
Appendix I 1.		Editorial	CISPR 12 "Vehicles, boats, and internal combustion engine - Radio disturbance characteristics - Limits and methods of measurement for the protection of off-board receivers", sixth edition 2007.	

Clause/ Subclause	Paragraph Figure/Table	Type of comment (General/ Technical/Editorial)	Proposed change	JUSTIFICATION
Appendix I 5.		Editorial	ISO 7637-2 "Road vehicles - Electrical disturbance from conduction and coupling - Part 2: Electrical transient conduction along supply lines only (deleted)", second edition 2004.	
Appendix I 7.		Editorial	ISO 11451 " Road vehicles - Vehicle test methods for electrical disturbances from narrowband radiated electromagnetic energy -": Part 1: General principles and terminology (ISO 11451-1, third edition 2005); Part 2: Off-vehicle radiation source (ISO 11451-2, third edition 2005); Part 4: Bulk current injection (BCI) (ISO 11451-4, second edition 2006).	Second edition of Part 4 has published in 2006.
