

**Justifications to GRRF-63-07  
(Brake Assist Systems)**

The document ECE/TRANS/WP29/GRRF/2008/2 from the European Commission introduces provisions for Brake-Assist Systems (BAS) into the regulation. The requirements address not only mandatory installations but also voluntary installation provided by the manufacturer.

However, OICA believes the application of the requirements should apply only when installation is mandatory.

**General**

Generally speaking, from a purely regulatory point of view, requirements in a regulation should be kept to a reasonable minimum. When the equipment is not required, it should not be mandatory to meet all the specified provisions for the system as long as the equipment enhances the system capability in the direction of those requirements.

On the other hand, it is reasonable and necessary to ensure that there is no negative influence of the added system on the basic braking performance. In the case of Brake Assist Systems, the function is designed to enhance the braking efficiency during emergency braking and some braking improvement is required to be confirmed.

Annex 8 (Complex Electronic Systems) is already applied to the current voluntary electronic BAS and this should be sufficient in the non-mandatory situation.

**Mixing of approved and non approved BAS**

There appears to be some concerns about a situation where the fleet in a territory would be composed of non-equipped vehicles, vehicles equipped with non-approved BAS and vehicles equipped with BAS approved to the regulation. However this transient situation would occur anyway if BAS were introduced as a mandatory or “if fitted” equipment.

**Comparison to ABS**

OICA would like to point out that the case of BAS is not similar to the case of ABS (antilock braking system). Antilock systems are designed to improve the stability and the steerability of the vehicle even though at the expense of the stopping distance in certain situations. Hence, ABS requirements are necessary, in particular under low adhesion conditions, to ensure the maintenance of good braking performance even when it is a voluntarily equipped. OICA fully supports the principle that the addition of a safety equipment should not imply undesirable side effects. This is not the case with Brake Assist System that improves the stopping distance in any circumstances.

**Equity toward homologation**

Applying the BAS requirements to voluntary BAS could lead to some unreasonable situations, where approval would be granted to a vehicle without BAS, while no approval would be granted to the same vehicle equipped with BAS, hence with improved braking characteristics, but whose BAS would simply not reach the performance requirements of the regulatory BAS definition.

In addition, homologation costs, when BAS is optional, would rise again, thereby penalizing the final customer.