

GTR-ESC-2008-10

Proposal of Implementation of ESC Requirement in ECE Regulation

A. Proposal

ESC Requirement shall be given a new number in ECE regulation instead of R13H Amendment.

B. Justification

We understand the necessity of EU to mandate the vehicle stability control system (ESC) for M1 and N1.

On the other hand, the installation of ESC should be optional in UNECE Regulation No.13H. Because the real traffic situation and the actual accident condition in each country is different, the each Contracting Parties in accordance with their traffic situation and actual accident condition should judge the installation of the requirement.

We have the same opinion for EVSC for heavy vehicles.

But, unfortunately, it was decided to mandate in R13 at last 143rd WP29 in November.

There is an afraid that ESC requirement will be mandated in R13H same as EVSC and it will decrease the flexibility for the contracting parties other than EU.

ECE R13H is the globally harmonized regulation and is adopted and will be also adopted in many contracting parties other than EU.

To begin with, the purpose of ESC requirement is to improve the vehicle stability at the emergency steer manoeuvre. In other words, it is not the system to improve the braking performance although this system utilizes some components of the brake-system.

Therefore from that point of view, it is appropriate to give the new number to ESC requirements same as the relationship between FMVSS135 of brake regulation and FMVSS126 of ESC.

And this will solve the problem, which is mentioned above.
