

PROPOSAL FOR AMENDMENT TO INFORMAL DOCUMENT No. GRRF-62-36

Note: The text reproduced below has been prepared by the experts from the People's Republic of China in order to make the application and scope of this GTR more appropriate. The modifications to the existing text of the Regulation are marked in **bold** characters.

A. PROPOSAL:

Paragraph 2.1, amends to read:

2.1 This regulation applies to ~~all Category 1-1, 1-2 and 2 with a gross vehicle mass (GVM) of 4,536 kilograms or less~~ **vehicles of category 1-1, 1-2 and 2 equipped with ESC system with a gross vehicle mass (GVW) of 4536 kilograms or less.** [and with steering wheel]

Insert a new paragraph 2.2 to read:

2.2 This regulation only specifies the function, performance requirements as well as the testing conditions and procedures. The installation of ESC will be mandated on the basis of national regulation.

Paragraph 4, amends to read:

4. General Requirements. Each vehicle ~~must be equipped with an ESC system that~~ **equipped with ESC shall** meet the general requirements specified in paragraph 4, the performance requirements ~~of in~~ paragraph 5, the test procedures specified in paragraph 6 and the test conditions specified in paragraph 7 of this regulation.

4.1 **Functional requirements.** ~~Vehicles to which this regulation applies must be equipped with an electronic stability control system that~~ **An electronic stability control system shall meet the following requirements:**

B. JUSTIFICATION:

The effectiveness of ESC system in reducing vehicle accidents and saving lives has been widely recognized, which also as the main purpose of this GTR to harmonization technical requirements of ESC.

However, this proposed GTR applies to vehicles of category 1-1, 1-2 and 2. This means not only passenger cars but also light buses and light trucks are covered by this regulation. Presently, the technical level of light vehicles are not so high as passenger cars, and only a very small portion of light buses and trucks are equipped with ESC systems. Especially for light truck, ESC means a large increase in cost in contrast to the relatively low vehicle price. For these reasons, the installation ratio of ESC on light buses and trucks is low and we do not expect a significant increase of this ratio in the near future.

The Statement of Technical Rationale and Justification give a flexibility allowing a jurisdiction to limit its domestic regulation to a narrow group of vehicles, when it determines that full scope application is inappropriate.

However, the text of paragraph in the proposed GTR is rigid, which says *each vehicle must be equipped with an ESC system that meets the general requirements specified in paragraph 4.....of this regulation.*

So, to avoid the passive influence caused by ambiguity, it is more appropriate to make it clear that this regulation just specifies the technical requirements for vehicles with ESC and mandatory installation is to be decided by the contracting parties according to their own situations.

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