

Meeting Report (5th meeting)

Report on the fifth meeting of the GRRF Informal Working Group on Alternative Method Electronic Vehicle Stability Control (AMEVSC) held 22nd – 23rd February 2011.

Venue: CLEPA Offices, 87 Boulevard Brand Whitlock; BE- 1200 Brussels, Belgium

Chairman: Dr. Michel LOCCUFIER (Belgium Ministry of Transport)

Secretariat: Mr. Paul JENNISON (CLEPA/Knorr-Bremse)

Participants: See document AMEVSC-05-05e

1. Chairman welcomed everyone to the meeting and noted the apologies for non-attendance from Mr. Lescail.
2. The draft agenda (document AMEVSC-05-03e) was adopted with the addition of the item “the signing of test reports by the approval authority”, under agenda item 4, at the request of Mr. Paeslack.

The document AMEVSC-05-06e (Annex 21 Appendix 2) was identified as a “starting” document with regard to future simulation tool work.

3. The report of the fourth meeting (document AMEVSC-04-09e) was reviewed and agreed without modification.
4. The chairman recalled his report to the 69th GRRF (GRRF-69-20 (AMEVSC-04-11e)) and gave a short report of the subsequent discussion (reference AMEVSC-05-02e) highlighting the following main points.
 - The UK objected to the use of simulation within the proposed test report procedure and as a result, following agreement by CLEPA members, all references to simulation were removed from Annex 19 Part 2 and Annex 19 Appendix 12.
 - The document GRRF-29-06-Rev.1 (AMEVSC-05-01e) was agreed.
 - While agreeing to the technical content of GRRF-29-06-Rev.1, Germany expressed concern regarding the “legality” of using test reports as proposed by the amendment to Annex 19 and advised that it was investigating. The issue of “legality” was questioned by CLEPA as test reports have been used for many years and are made use of in 4 Annexes.

As a result, the GRRF Chairman requested Germany to provide a working document for GRRF to consider at its September 2011 Session, if following the investigation Germany still had concerns. In the intervening period GRRF-29-06-Rev.1 would be sent to WP.29 as Supplement 9 to the 11 Series for consideration at the November

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2011 Session subject to any legal concerns being raised by Germany at the GRRF September 2011 Session.

- Subject to the consent of WP.29, it was agreed that the AMEVSC Group would continue and study the use of the simulation tool. WP.29 subsequently gave its consent at its March 2011 Session (ECE/TRANS/WP.29/1089 paragraph 39).

In discussing the “legality” issue, the “signing of test reports by the approval authority” as raised by Mr. Paeslack was addressed, with the following being the main points of the discussion.

- Germany raised the possibility of conflict between the use of a test report and paragraphs 3.3. and 3.4. of ECE R.13 as they require that “a vehicle representative of the vehicle type to be approved shall to be submitted to the Technical Service conducting the approval tests” and that there shall be “satisfactory arrangements for ensuring effective control of the conformity of production”. This was not seen as an issue by CLEPA as the vehicle type features that have an effect on the performance of a vehicle stability function are covered in Annex 19 part 2, and Annex 21 is only a part of the braking system approval for which a vehicle is still required. Also, as Annex 21 is part of the braking system type-approval, conformity of production is shown by the vehicle manufacturer in the same way as for, for example, a foot brake valve.
- The definition of a vehicle type (paragraph 2.2. of ECE R13) was seen as not being totally appropriate for today’s vehicles from a technical perspective and it was questioned as to whether it was strictly adhered to in the type-approval process. However, this was seen as being much larger than just a technical issue, e.g. there could be taxation implications, and even as a technical issue it was outside of the scope of this working group.
- The question of whether the relationship between the vehicle manufacture and the Technical Service conducting the vehicle/braking system type-approval was being compromised by the use of a test report was raised. In the view of CLEPA this was in no way changed, as the test report was only an alternative method and it was for the vehicle manufacturer in the first instance to propose its use and for the Technical Service to agree to its use and to its suitability.
- The objective of the requirement for the system manufacturer (not vehicle manufacturer) to provide the Technical Service with a information document (paragraph 1.1.2.1. of Annex 19 Part 2) was clarified as:
 - The information document is what the system supplier claims, in terms of functionality and performance, for the vehicle stability function.
 - The testing carried-out by the Technical Service is verification of these claims.
 - By attaching this information document to the test report the vehicle manufacturer is also able to evaluate the system manufacturer claims, and by comparing them with the test report results and the parameters of the vehicles for which type-approval is required, determine whether to use the test report.

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- The question was raised by the KBA (Kraftfahrt-Bundesamt) as to “what is the Approval Authority, i.e. the KBA, signing for” in signing a test report? Is it only that the test report has been seen (no implication in the case that some thing is incorrect) or is it that there is a “responsibility” for the content and any following actions, e.g. CoP?

CLEPA was of the view that this was not an issue of principle, and that it was appropriate that a test report carried 2 signatures – the Technical Service conducting the work and an Approval Authority. Technical Services are required to be accredited by the approving Approval Authority and the dual signature requirement provides an indication/reminder for each party of its responsibilities. A single signature could open the door to abuse in countries where the Technical Service is a non-Governmental organisation and, thereby, reduce the status of such a document. A lack of resource/technical competence can (should) be covered by an auditing system – with accreditation being withdraw in the case of incompetence – and not used as an abdication of responsibility.

The KBA advised that it had reservations with regard to being able to support the test report approach, and that it would be conducting an investigation into the legal aspects surrounding the use of test reports.

As a result of this forthcoming KBA/Germany study the Chairman held over any further discussion until the next meeting by which time the outcome of the study would be known.

5. In the initial discussion of the document AMEVSC-05-06e it was suggested that the “character of a vehicle” definition should be in R.E.3, in addition to ECE R.13. The AMEVSC secretary undertook to discuss this with the chairman of the group currently working on amendments to R.E.3.

The KBA expressed the view that a simulation tool manufacturer who is not a vehicle manufacturer is not acceptable. This, as a concept, was challenged by CLEPA as it was considered to go against the basic objective behind the introduction of simulation in the vehicle stability function type-approval procedure by the EVSC informal working group. CLEPA understood that the objective of simulation was to simplify the type-approval process, via an alternative method, to reduce costs. To restrict this to vehicle manufacturers would in reality mean that simulation would only be available to the larger companies as only they had the substantial resources required to develop a simulation tool. As a result, the draft proposal shown in document AMEVSC-05-07 was developed.

The development of both documents – AMEVSC-05-06e and AMEVSC-05-07e – will continue at the next meeting.

6. A request to consider possible changes to Annex 20 was rejected by the chairman on the grounds that Annex 20 is only applicable to trailers, trailer manufacturers are not represented in the group and trailers are not within the scope of the group. The advice was given that any proposals, that any party may have, should be put forward using the normal amendment procedure.
7. **Next meeting:**

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- Date:** 30th and 31st August 2011 – starting 10.00 hrs and finishing 16.00 hrs.
- Venue:** CLEPA Offices, 87 Boulevard Brand Whitlock; BE- 1200 Brussels, Belgium
- Input:** Any comments or documents relating to this meeting should be sent to the CLEPA Secretariat (Techsec@clepa.be) with a copy to paul.jennison@knorr-bremse.com in e-format as early as possible prior to the meeting.
