

**Position Paper on Additional Sound Emission Provisions (ASEP)
described in paragraph 6.2.3. and Annex 10
of the draft version of UNECE Regulation No. 51:03**

Submitted by OICA

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OICA has observed during the last months the discussion about a concrete wording for additional sound emission provisions (ASEP) in the context of the revision of the type approval for vehicles. It became obvious that there are very different opinions among the contracting parties about the spirit of ASEP.

After several meetings of the GRB Informal Group it can be concluded, that it is difficult to define an additional test and actually there is no worked out procedure available and the today's type approval test procedure is justified to be unacceptable. Potential alternatives have been discussed and multiple new ideas for tests were considered, but none of them has reached a status of development for a closer look.

The automotive industry started in the mid of the nineties with the work to revise the outdated type approval test as questioned by the European legislative when the last step of lowering the limits in the European Directive 70/157/EEC was published (see official journal L371 from 1992). In studies ACEA tried to answer the questions, what is traffic, what is annoyance, where are noise problems and what are the reasons. These results were taken as a basis for the development of a new test proposal. Today the test draft has reached the quality that makes him acceptable for use.

Specifically this development process makes clear, how difficult it is to create a new test, which is applicable to all means of technologies that exist. OICA cannot imagine, how an additional test can be created within a short time and without involving all necessary groups on an international level.

Position of OICA:

Recognizing the willingness of contracting parties to have additional sound emission provisions, automotive industry has not refused cooperation and offered in Germany support on a national base for the creation of a concrete paper. However OICA proposes to lift such work on an international level.

OICA offers together with this position paper a proposal for ASEP based on the results of the last GRB Informal Group Meeting. It highlights the actual feasible, while approaching a new work item, where no clear scope was defined. This should be understood as a practical approach with respect to a quick finalization of the revision of UNECE Regulation No. 51:03.

Longer time consuming discussions about ASEP hinder more important issues, which need to be done: Setting new limits for the type approval test and the final technical adjustments of annex 3 as experience grows with the new test method.
