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agenda item 2.3.)

PROPOSAL FOR DRAFT SUPPLEMENT 4 TO THE 01 SERIES OF AMENDMENTS
TO REGULATION No. 97

(Vehicle alarm systems)

Transmitted by the expert from Canada

Note: The text reproduced below was prepared by the expert from Canada in order to amend Regulation No. 97 in response to concerns raised by the Canadian insurance industry during the Canadian regulatory development process. This document supersedes document TRANS/WP.29/GRSG/2005/6 (TRANS/WP.29/GRSG/67, para. 30).

Note: This document is distributed to the Experts on General Safety Provisions only.

A. PROPOSAL

Paragraph 32.4.1., amend to read:

"32.4.1. ...
- a maximum of 1 minute after removing the key of the ignition lock."

Paragraph 39., amend to read:

"39. TRANSITIONAL PROVISIONS

39.1. Type approval of an immobilizer

39.1.1. As from 36 months after the date of entry into force, Contracting Parties applying this Regulation shall grant approvals only if the type of component or separate technical unit to be approved meets the requirements of this Regulation as amended by Supplement 4 to the 01 series of amendments.

39.1.2. Contracting Parties applying this Regulation shall continue to grant approvals to those types of component or separate technical unit which comply with the requirements of this Regulation as amended by any previous series of amendments provided that the component or separate technical unit is intended as a replacement for fitting on vehicles in use and that it would not be technically feasible to fit a component or separate technical unit which satisfies the requirements contained in this Regulation as amended by the Supplement 4 to the 01 series of amendments.

39.2. Approval of a vehicle type

39.2.1. As from the date 36 months after the date of entry into force, Contracting Parties applying this Regulation shall grant approvals only if the type to be approved meets the requirements of this Regulation as amended by the Supplement 4 to the 01 series of amendments.

B. JUSTIFICATION

Transport Canada published an amendment to Canada Motor Vehicle Safety Regulation No. 114 to introduce requirements for vehicle immobilizers. The proposal introduces an alternative for the manufacturers to use immobilizers conforming to the North American industry standard CAN/ULC-S338-98 or immobilizers described in the Regulation No. 97 (14 October 2002). The Insurance Bureau of Canada (IBC) and the Underwriters' Laboratories of Canada (ULC) questioned the use of Regulation No. 97. They are concerned that some requirements of Regulation No. 97 are unclear or not stringent enough to be comparable with the CAN/ULC-S338-98 requirements.

Specifically, the time requirements in paragraph 31.7. are not quantified and as such are open to interpretation. In order to facilitate unequivocal enforcement and to ensure uniform compliance, the time requirements should be specified to eliminate any ambiguity. However, because of the plethora of available immobilizer systems and the speed with which the architecture of such systems changes,

the general consensus was that a method of attack could not be readily standardized. Setting a specific time limit would be difficult to enforce, therefore the proposal (TRANS/WP.29/GRSG/2004/11) was revised to exclude changes to paragraph 31.7.

With respect to paragraph 32.4.1., there is concern that the maximum of 5 minutes allowed for arming represents a significant window of opportunity and leaves the vehicle too vulnerable. Reducing the maximum time allowed for arming to 1 minute ensures a better protection of the vehicle.

Since Transport Canada's policy supports global harmony, an amendment is proposed to UNECE Regulation No. 97 to address the concerns of the Canadian insurance industry and make vehicles around the world better protected against unauthorized use.
