

Transmitted by the expert from Japan

COMMENTS ON DRAFT 03 SERIES OF AMENDMENTS TO REGULATION No. 10  
(Electromagnetic compatibility)

Note: The text reproduced below was prepared by the expert from Japan and it refers to Informal document No. GRE-56-6.

Japanese experts have examined GRE-56-6 "Proposal for the draft 03 series of amendments to Regulation No.10", transmitted by the expert from the European Commission (EC), and are concerned about some provisions in this proposal.

The proposal provides significant changes and strong impact to current vehicles' electronics component and certification test facilities. For that reason, Japanese experts would like to receive more detailed justification regarding this proposal. Without clarification of concerns mentioned below, Japan would not be able to resume its position on adherence to Regulation No. 10 as amended by the 03 series of amendments.

1. Application for approval

The new paragraph 3.1.8. of the proposal:

"3.1.8. For vehicles of categories M,N, and O the vehicle manufacturer must provide a statement of frequency bands, power levels, antenna positions and installation provisions for the installation of RF-transmitters, even if the vehicle is not equipped with RF transmitter at time of type-approval. This should cover all mobile radio services normally used in vehicles. This information must be made publicly available following the type-approval.

Vehicle manufactures must provide that vehicle performance is not adversely affected by such transmitter installations."

Paragraph 3.1.8. requires the vehicle manufacturer to provide a statement of frequency bands, power levels, antenna positions and installation provisions for the installation of RF-transmitters and its evidence of immunity performance.

The text "all mobile radio services normally used in vehicles" is not clear. In each country there are various transceivers and market of mobile services is different. Therefore, the channel frequency and the limit of mobile service power are also different in each country. We are concerned that such a provision may cause confusion during application of this Regulation and is not appropriate for this Regulation. For that reason, we suggest to delete this provision from the proposal.

2. Reference to CISPR 12 (fifth edition) test method in Annex 4

In Annex 4 "Method of measurement of radiated broadband electromagnetic emissions from vehicles" the test method according to CISPR 12 (fifth edition 2001) is used.

However, vehicle state condition during that test is not adequate for hybrid vehicles. According to this method, the separate measurements for electrical motor and internal combustion propulsion engine are required. Most of current hybrid vehicles are not able to fulfil this requirement and they shall be tested with both systems functioning (the electrical and the internal combustion propulsion).

For that purpose, IEC CISPR/D amended the CISPR 12 fifth in 2005 for the measurement of hybrid vehicles. We suggest to take into account these recent amendments and to refer in Annex 4 to CISPR 12 5.1 edition 2005.

3. ISO 17025 accreditation of vehicle test laboratory (Annexes 4, 5, 6)

According to Annexes 4,5,6, if the manufacturer provides alternative measurement data for the whole frequency band from a test laboratory accredited to the applicable parts of ISO 17025 (first edition 1999) and recognized by the Approval Authority, the Technical Service may divide the frequency range in some frequency bands and perform tests at the representative frequencies to confirm that the vehicle meets the requirements of these Annexes.

There are few test laboratories outside of the EC (in Japan) which have ISO 17025 accreditation and are capable for vehicle EMC test. The whole band test needs significantly longer test duration, so, it will be difficult for witness test. To promote the wider application of Regulation No. 10, it would be better to accept an alternative, without ISO 17025 accreditation, in this series amendments. Therefore, we suggest to amend the proposed text as follows: "~~accredited to ISO 17025 and recognised by approval authority~~" to "**accredited to ISO 17025 or recognised by the approval authority**".

4. Clarification of measurement location for category L vehicles (Annex 5)

In Annex 5 "Method of measurement of radiated narrowband electromagnetic emissions from vehicles" there is no description of measurement location for L category vehicles. We suggest to clarify the text and apply for category L vehicles the same test location requirements as in Annex 4.

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