

## **Global Technical Regulation on Electronic Stability Control**

Comments regarding the proposal by the United States of America Government to have a Global Technical Regulation (GTR) on electronic stability control (document ECE-TRANS-WP29-2007-17) by the Chairman of the GRRF Informal Working Group on Electronic Vehicle Stability Control (EVSC).

The implementation of legislation in the United States of America mandating all vehicles under 4536 kg., excluding low volume manufactures, to be equipped with an electronic stability system by the year 2012 is a most welcome advance in accident prevention.

While I am pleased that this step forward has been made, I am equally disappointed that the ECE regulatory process did not get there first.

While being supportive of the idea of having a uniform global standard via a GTR, I am concerned as to the speed at which this could be realistically achieved. The work carried-out by the EVSC informal working group has shown there is a major difficulty in reconciling the desire of the technical authorities to have a predefined practical test with the vehicle manufacturers and system suppliers position that there is no single test that will cover all vehicles and that multiple tests with the appropriate level of safety equipment are not economically viable. This is with an approval system based on the use of an independent organization (technical service) and not self certification by the vehicle manufacturer, as practiced in the USA, which makes the situation even more difficult.

Also the work being carried-out on the motor cycle and passenger car braking GTRs has shown that reconciling the USA and ECE approaches is very difficult where similar problems relating to low adhesion testing are also likely to arise when considering specific test procedures.

The task of the EVSC informal working group set by GRRF was to focus its activities on the heavy commercial vehicle sector which is a much more varied vehicle category than the passenger car/sport utility vehicle (SUV). However the solution developed by the EVSC group for commercial vehicles could equally be applied to passenger cars/SUVs. Also electronic stability control systems already have a high voluntary fitment rate on cars/SUVs, but have a very low take-up on commercial vehicles so that step-by-step mandating, starting with the most dangerous vehicles, would produce the most benefits.

Therefore, it would seem appropriate to restrict the GTR to passenger cars and SUVs and continue with the proposed EVSC amendments to Regulation 13 on a separate basis. In the fullness of time it may be possible to apply some of the principles developed in the GTR to heavy commercial vehicles.

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