

Concerns of the Industry about document ECE/TRANS/WP29/2007/106
(Introduction of EVSC into UNECE Regulation No. 13)

"PERMANENT ALL-WHEEL-DRIVE (AWD) VEHICLES"

a. Relevant paragraph:

The proposed paragraph 5.2.1.32 reads:

"5.2.1.32. Subject to the provisions of paragraph 12.4. to this Regulation, all vehicles of categories M₂, M₃, N₂ and N₃ **1/ having no more than 3 axles**, shall be equipped with a vehicle stability function. This shall include roll-over control and directional control and meet the technical requirements of Annex 21 to this Regulation."

Footnote 1 reads:

"1/ Permanent All-Wheel-Drive (AWD) vehicles, special purpose vehicles (e.g. mobile plant using non standard vehicle chassis – e.g. cranes - , hydro-static driven vehicles in which the hydraulic drive system is also used for braking and auxiliary functions), Class I and Class A buses of categories M₂ and M₃, articulated buses and coaches, N₂ tractors for semi-trailer with a gross vehicle mass (GVM) between 3.5 and 7.5 tonnes, shall be excluded from this requirement."

b. Concern:

"Permanent All-Wheel-Drive (AWD) vehicles" is not defined in UNECE R13. Some uncertainties hence raise about the application of the requirements. For example a vehicle where the front wheel drive can be engaged/disengaged can not be considered as a "permanent all-wheel-drive vehicle", but needs to be part of the exemption. Another example is a basic AWD vehicle which is equipped with an additional axle by an independent bodybuilder. In both the above examples the vehicle is designed to circulate off-road and would probably never, or very seldom circulate on open road.

Those vehicles in addition have very specific technical characteristics which directly impact EVSC design and would require specific adjustments, steering wheels, sensor installation etc. implying important extra-effort for the manufacturers.

c. Proposal for a solution:

OICA well understands which off-road vehicles were targeted in the footnote and why they are exempted. However the footnote does not fully reach the target.

OICA in consequence proposes to change, in footnote 1/ of the proposal ECE/TRANS/WP.29/2007/106, the wording "Permanent All-Wheel-Drive (AWD) vehicles" into "**Off-Road vehicles**".