

**PROPOSAL FROM INDIA FOR DRAFT AMENDMENTS TO
REGULATIONS Nos. 90, 13, 13-H and 78**

A. PROPOSAL

1. India accepts the amendments to Regulations Nos. 13 and 13-H as proposed vide documents ECE/TRANS/WP.29/GRRF/2008/11 and ECE/TRANS/WP.29/GRRF/2008/10 respectively.
2. India suggests that a similar amendment may be considered for ECE Regulation No. 78 also.
3. India suggests that amendment to Regulation No. 90 as proposed vide ECE/TRANS/WP.29/GRRF/2008/7 need not be carried out.

B. JUSTIFICATION

1. Amendments to Regulations Nos. 13 and 13-H covers the requirements of replaceable brake parts without putting an additional burden on the manufacturers of M, N and O category vehicles for a separate approval for Regulation No. 90, for selling the original brake parts in the replacement market.
2. There is a need for a similar amendment to R78 so that the same procedure can be followed for L-category vehicles also.
3. There would be no need to give reference to requirements for OE replacement brake parts in Regulation No. 90 as these would be fully taken care of at the time of approval of the vehicle model for brake system.

In addition, justification given in document ECE/TRANS/WP.29/GRRF/2008/7 states that:

“As some Contracting Parties to the 1958 Agreement have signed Regulations Nos. 13 and 13-H, **but are not applying Regulation No. 90**, these requirements have been inserted in Regulation No. 90.”

An amendment to Regulation No. 90 would have no effect on the contracting parties who are not applying Regulation No. 90.

Amendment to Regulation No. 90 would have a benefit only in for Contracting Parties who are applying Regulation No. 90 without applying Regulation No. 13/13-H or 78. India feels that this is a theoretical situation as technical requirements of Regulation No. 90 are same as those given in Regulation No. 13/13-H or 78 as applicable.

A study of Contracting Parties listed in ECE/TRANS/WP.29/343/Rev.16 shows that there are no Contracting Parties for Regulation No. 90 which have not accepted at least one of Regulation No. 13/13-H or 78.
