

Transmitted by the experts from ETO

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 59

Note: The text reproduced below was prepared by the experts from ETO in order to remove an unequal treatment between OE and aftermarket silencing systems, as the current wording puts the aftermarket at a disadvantage.

A. PROPOSAL

ECE/TRANS/WP.29/GRB/2008/5/Rev.1, Paragraph 6.2.3.1., amend to read:

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6.2.3.1. [In case the replacement **silencing** system or component is a system or component with variable geometry, **in the application for type approval the manufacturer shall provide a statement (conform par 20 of Annex 1) that the vehicle type to be approved complies with the requirements of paragraph 6.2.3 of regulation 51. The type approval authority may require any relevant test to verify the compliance of the vehicle type to the additional sound emission provisions.**

B. JUSTIFICATION

Based on the relative size of their market segments, comparing OEM to aftermarket, suppliers of exhaust silencing systems face inordinately high certification costs if required to comply with the currently proposed R-59 protocol.

In case of replacement silencing systems or components with variable geometry, the current proposed text (R51 and R59) prescribes mandatory testing for the aftermarket according to Annex 10, while providing vehicle manufacturers the flexibility to either submit their product for testing or sign a declaration of compliance.

Regardless of whether compliance is voluntary or mandated, such tests could still be required of aftermarket exhaust systems employing variable sound attenuation technologies. The ROI of compliance for such systems is skewed in such a way that the cost-to-benefits ratio diminishes potential profits for sales of these systems.

However, if R-59 is to be implemented in its present or our proposed slightly modified form, consideration should also be given regarding test vehicle selection for compliance coverage for all aftermarket exhaust systems.

Compliance applicants provide a listing of all vehicles (model year, brand and engine family) for which a given product (or product line) will be sold. Subsequently, the technical service selects a “worst case” vehicle for testing, based on the OEM’s certification data. This approach could minimize applicant test costs (to cover a range of applications) and satisfy a product’s noise emission performance on a “worst case” vehicle.

Even though the requirements of R-59 are relatively complex, require specialized instrumentation, involve skilled technicians, utilize application-specific data reduction techniques and must be performed under rigid and controlled conditions, the financial burden and impact it creates on applicants can be reduced by our approach.

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