

## **Comments on Changes to the Requirements for the Positioning of Test Points as Proposed by Denmark in ECE/TRANS/WP29/GRRF/2012/12**

### Introduction:

At the 71<sup>st</sup> GRRF Denmark submitted Document GRRF-71-19 the content of which has been consolidated into ECE/TRANS/WP29/GRRF/2012/12. For ease of understanding industry comments on the proposal to amend the requirements with respect to the positioning of test points is considered independently.

### Discussion:

In ECE/TRANS/WP29/GRRF/2012/12 it is proposed to add a new paragraph requiring a test point to be installed between the coupling head and the trailer relay emergency valve. Within ECE Regulation 13 there is no definition of a relay emergency valve, only that trailers must fulfil the requirements for the automatic brake as specified within paragraph 5.2.1.18.4.2 when the supply line is exhausted.

Many trailer braking systems produced today do not have a relay emergency valve but fulfil the requirements of paragraph 5.2.1.18.4.2 by other means. Equally when a relay emergency valve is installed on a trailer it is the first valve in the trailer braking system after the coupling head. In consequence the requirement specified with paragraph 5.1.4.2.4 of ECE Regulation 13 states that a test point shall be installed as follows:

*5.1.4.2.4. In each independent circuit of the braking system so it is possible to check the input and output pressure of the completed transmission line.*

Therefore as it is already required to install a test point at the coupling head to enable the above requirement to be fulfilled the proposed amendment is considered unnecessary and Regulation 13 should remain unchanged.