

Regulation No. 112

ECE/TRANS/WP.29/GRE/2011/35

Comments from SAE

Comments to GRE/2011/35

After providing a preliminary response to ECE/TRANS/WP.29/GRE/2011/35 in informal document GRE-68-41, the expert from SAE provides a position on the proposal in this document.

The Materials Committee in the SAE Lighting Systems Group has studied ECE/TRANS/WP.29/GRE/2011/35 in detail and has come to the conclusion that SAE cannot support the proposal. Without data on the new test method, there is not enough information to recommend changing from one method to another (existing method vs. proposed). If some specific information or data can be presented on how the new test method is an improvement over the existing test method, then SAE is open to review the proposal again.

Rationale for SAE Position:

A proposed change to the current test method may be warranted to reduce the amount of testing variability on how the test may be performed. Changing the language in an old test standard may infer that current accepted materials need to be retested to a new standard language. If new procedures are accepted, then testing data to show an improvement in the variation would be warranted to prove that no undue burden would be placed upon the industry (i.e. new test chambers, retesting of currently accepted materials) without justification.

Testing specifics presented:

It appears that in the new proposal a narrower spectrum than is currently specified is recommended along with a more specific amount of dosage. While this test method wording may reflect more modern wording in the weathering industry and the change does not seem to be a negative suggestion, it also does not specifically show that this test will be a better method and give an improvement to the industry. The summary from the Q-Lab presentation statement, "Proposed language does not change any conditions or requirements" does not effectively present a case for recommending this change.

Suggested Impact Study Points:

If there is an interest to further pursue and evaluate the proposal, SAE suggests studying the impact of the change on the following points:

- Will this wording change result in new or different test chambers or equipment than previous wording?
- Will this new wording result in the need to re-test previously compliant materials?
- Is there an improvement in the data output to warrant moving forward with this change?
- Does this new language improve the test method such that the variation between labs would be significantly reduced or eliminated?