Submitted by the expert from IMMA Informal document **GRE-80-31**

(80th GRE, 23-26 October 2018,

agenda item 7(a))

Proposal for amendments to GRE/2018/43

Proposal for amendments to Regulation No. 10

(Electromagnetic compatibility)

Submitted by the expert from the International Motorcycle Manufacturers Association[[1]](#footnote-2)\*

The text reproduced below was prepared by the experts from International Motorcycle Manufacturers Association (IMMA), to propose amendments to GRE/2018/43. The modifications to GRE/2018/43 are highlighted in red.

I. Proposal

*Paragraph 3.1.8.*, amend to read:

"3.1.8. For vehicles of categories [**L6 and L7]**, M, N [~~and~~] O, [**T, R and S**], the vehicle manufacturer shall provide a statement of frequency bands, power levels, antenna positions and installation provisions for the installation of radio frequency transmitters (RF-transmitters), even if the vehicle is not equipped with an RF transmitter at time of type approval. This should cover all mobile radio services normally used in vehicles. This information shall be made publicly available following the type approval."

II. Justification

1. We IMMA are generally concerned about the unbounded use of radio transmitters during riding because of the risk of distraction. In particular we do not recommend to use any such device that interferes with the main riding tasks.
2. Looking at paragraph 3.1.8., we are of the opinion that it is not clear enough in terms of precise testing conditions for category L. For example, it is not clear what the testing boundary should be in case of unbodied category L vehicles***.***
3. In addition, the scope of ISO 11451-3, which is commonly used to perform immunity testing by means of on-board transmitter simulation in accordance with paragraph 3.1.8., only describes tests on passenger cars and commercial vehicles. Two wheeled vehicles are not in the scope.
4. IMMA suggests to precisely define the testing conditions for category L before extending this Regulation to such category.

1. \* In accordance with the programme of work of the Inland Transport Committee for 2016–2017 (ECE/TRANS/254, para. 159 and ECE/TRANS/2016/28/Add.1, cluster 3.1), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate. [↑](#footnote-ref-2)