UN Regulation No. 144 (Uniform provisions concerning the Accident Emergency Call Systems)

DRAFT Proposal for a new series of amendments to UN Regulation No. 144
(Accident Emergency Call Systems)

The modifications to the current text of UN Regulation No. 144 are marked in bold characters for new and strikethrough for deleted characters.

I. PROPOSAL

Paragraph 1.1.(b) (Scope), amend to read (Footnote 1 remains unchanged):

“1.1. This Regulation applies to:

……

(b) Part Ib:

- the approval of AECDs which are intended to be fitted to vehicles of categories M1 and N1.1;
- at the request of the applicant, the approval of AECDs which are intended to be fitted to vehicles of other vehicle categories.”

Part III, amend paragraph 34.1., to read:

“34.1. If the vehicle type submitted for approval in accordance with paragraph 33. above meets the requirements of paragraph 35. of this Regulation, approval shall be granted.

Before granting approval for a vehicle type, the competent authority shall ensure that all the parts listed in paragraph 17.6.1, 35.10.1 are tested to Annex 9. If the AECS is fed by a power supply other than the back-up power supply described in paragraph 17.6.2, 35.10.2, and this power supply is the only AECS power supply, this power supply shall also be tested to Annex 9 to this Regulation.”

Insert new paragraphs 41. to 41.4., to read:

“41. Transitional provisions

41.1. As from the official date of entry into force of the 01 series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept UN type-approvals under this Regulation as amended by the 01 series of amendments.

41.2. As from 1 September 2022, Contracting Parties applying this Regulation shall not be obliged to accept UN type-approvals to the original text of this Regulation, first issued after 1 September 2022.

41.3. Contracting Parties applying this Regulation shall continue to accept UN type-approvals issued according to the original text of this Regulation first issued before 1 September 2022.

41.4. Contracting Parties applying this Regulation shall not refuse to grant UN type-approvals according to any preceding series of amendments to this Regulation or extensions thereof.”
II. Justifications

1. This OICA proposal complements the Russian informal document GRSG-116-15

2. OICA is of the opinion that it should be clarified that the application of an AECD approval to other vehicle categories than M1 and N1 (as suggested by Russia) should be left up to the applicant. In absence of an AECS installation or an AECS vehicle regulation for other vehicle categories, the text should make it clear that an AECD approval for other vehicle categories than M1 and N1 cannot be mandatory.

3. The proposal also aligns the power supply requirement of Part III, para. 34.1 with the corresponding requirement in Part II, para. 25.1.

   With the existing text in para. 34.1, misunderstanding could arise that if the vehicle is equipped with both
   - a “back-power supply” as listed in para. 35.10.1
   and
   - a “Power supply other than back-up power supply mentioned in paragraph 35.10.1” as listed in para. 35.10.2
   both should be tested according to Annex 9. The “Power supply other than back-up power supply mentioned in paragraph 35.10.1” should indeed only be tested if it is the only power supply for the AECS.

4. Since informal document GRSG-116-15 deletes the existing exemptions in para. 1.3, and hence introduces more severe requirements, the changes should be introduced via a new series of amendments with appropriate Transitional Provisions of 2 years.

The following vehicle specifications are no longer exempted:
- Vehicles in the scope of neither UN Regulation No. 94 nor UN Regulation No. 95 and not fitted with an automatic triggering of a AECS;
- Vehicles of Category M1 in the scope of UN Regulation No. 94 and not equipped with frontal airbag;
- Vehicle of Category N1 in the scope of UN Regulation No. 95 and not equipped with side airbag.

Effectively the application of AECS requirements is now entirely based on the scope of UN Regulations Nos. 94 and 95 and no longer takes into account the presence of an airbag and its triggering system.

The manufacturers need sufficient time to ensure AECS compliance for new vehicle types and in the same time, the changes should not affect existing vehicle types that were given an AECS type approval already.