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agenda item 7)

22.06 REGULATION MOTORCYCLE HELMET COMMUNICATION INDUSTRY

GRSP MEETING

JULY 21th , 2020



INDUSTRY STANDPOINT

The communication industry supports a regulation that contributes to ensure the rider safety however, it needs to be reasonable and that could be implemented in a practical manner

MOTORCYCLE COMMUNICATION INDUSTRY AT A GLANCE

- Established over 15 years ago to provide high quality communication systems to the motorcycle industry
- Annual revenue turnover estimated at 150 millions of Euros
- We employ hundreds of direct workers and thousands of other employees indirectly
- Our industry is being represented by six leading companies



REGULATION 22.06

7.3.1.3.5. Helmets placed on the market with accessories shall be examined to assess that the supplementary equipment has no adverse effect and that in any case the protective helmet and/or visor still complies with all the requirements.

Note: The evaluation shall be done with and without the accessory and their support with particular attention, as example, to energy absorption, sharp edges and field of vision.

No helmet shall be modified from its original specification as manufactured. Accessories must be fitted in accordance with the helmet manufacturer's instructions. Only accessories tested during the type approval procedure of the helmet keep the type approval valid.

22.06 REGULATION IMPACT ON COMMS INDUSTRY

- Drafted without any input from the motorcycle helmet comms industry, and without its knowledge
- The text, creates a major trade barrier for motorcycle helmet communication commonly used at present by the motorbike riders
- Our industry will be at the mercy of helmet manufacturers' willingness to incorporate (or not) communication products depending purely on their commercial interests
- Communication devices contribute to the active and post-crash safety of the motorcycle riders
- The high cost of the tests will eliminate all but the biggest players in the industry creating an effective monopoly, undermining free competition, and hurting European consumers freedom of choice

ESTIMATED ANNUAL COST FOR COMMS APPROVAL

The industry is expected that the annual homologation cost as a result of R22.06 is

> €2.75M - per year, per industry player

OTHER INDUSTRY ARGUMENTS

- Being able to communicate while riding increases rider safety (active vs. passive safety). If we can avoid the accident, it is better than mitigate the consequences.
- The high test costs will reduce the number of companies operating in the field and could destroy the industry
- The destroy of the legacy industry could develop a market for low-quality products that did not undergo through any certification process and sold through internet from remote places. This is a major risk to the rider and the society
- If any of the industry members manage to cover the cost, we will have to raise our product prices significantly to compensate for the high homologation expense and this will downsize the market

INDUSTRY PROPOSAL

The comms industry is asking to be included in the process of defining future relevant homologation to overcome the trade barrier and to allow a safe way for the motorcycle rider to communicate while riding

As an immediate action we ask the GRSP to commission a corrective process for the 22.06 that will include :

Particular tests for «helmets ready for accesories»

Particular tests for «communication accesories»

Set compatibility conditions to make sure the rider safety is ensured

The industry is willing to help with its knowledge to draft a reasonable amendment to consider the aftermarket accessories



THANK YOU

FINANCIAL SIMULATION – ANNUAL BASIS

Estimated annual cost to homologate existing communication devices with new helmets presented during the year per comm industry member:

Item		Assumptions
Existing comms model	5	Each comms model tested on 60 new helmets every year
New comms models	1	Tested on population of 250 existing 22.06 helmets
# of tests	550	$(5 \times 60) + (1 \times 250) = 550$
Expected Cost of approval	€5,000	Estimation per helmet & communication device combination
	550 x €5,000	

Yearly approval budget per communication industry member = €2.75M