

Proposals for the discussion of Harmonization of the provisions on Electric Vehicles between R13H and FMVSS 135

The purpose

We propose the following process for efficient discussion of Harmonization Issues:

- (1) **Classify the proposal for harmonization (46th GRRF Inf. Doc. 4) into the following three types A), B), C)**

A) Items on which discussions are likely to center on the technical approaches

B) Items on which the difference is derived from the philosophy of testing.

If we can not harmonize, it is necessary, for example, to agree the alternatives for any item which in which the difference derives from the different market environment.

Example: Warning Indication

C) Items on which the difference results from the different certification systems between the Type Approval of EU and the Self Certification of US.

We need the general agreement at first.

Example: Deem it equivalent if the two requirements are equal in practice considering the different certification system.

- (2) **Proceed with Discussions at GRRF**

1) Item A)

For those items related to proposed amendments in FMVSS 135, we will take into account the opinion of US delegates.

For the items related to proposed amendments to R13H, we will discuss at GRRF.

2) Item B)

We will make the individual solutions considering background differences.

3) Item C)

We will first make the general agreement and then confirm the each item.

4) Classification of the proposal (46th GRRF Inf. Doc. 4)

No	Item	Classification	Proposal for Harmonization
1	Definition of the Electric Vehicles	A)	Amendment of R13H
2	Definition of SOC concerning the maximum speed	A), C)	Amendment of FMVSS135
3	Definition of Electric Regenerative Brake	A),B)	Amendment of FMVSS135
4	Check of the vehicle behavior	A)	Amendment of R13H,FMVSS135
5, 6	Indication of warning	B)	Unify or permit the alternative for the different markets
7	Definition of SOC	C)	Equivalent in practice
8	Definition of SOC when burnishing Burnishing procedure	A) C)	SOC: Amendment of FMVSS135 Burnish: Equivalent in practice
9	Definition of SOC when testing	B)	Amendment of FMVSS135
10	Requirement for non-hydraulic Brake by Wire. (Electro Mechanical Brake)	Others	Add the new requirement NOTE (not directly connected to EV)
11	Mode of RBS when testing	A),B)	Amendment of FMVSS135
12	Performance (engine disconnected)	A),B)	Amendment of FMVSS135
13	Provisions for failed case	A),B),C)	Amendment of FMVSS135
14	Electric Parking Brake	A)	Amendment of FMVSS135
15	Vehicle speed for heating snubs	A),B)	Amendment of FMVSS135
16	Measurement of hot performance	A),C)	Amendment of FMVSS135

A): Items on which discussions are likely to center on the technical approaches

B): Items on which the difference is derived from philosophy of tests.

C): Items on which the difference results from the different certification systems between the Type Approval of EU and the Self Certification of US.
