

Japan's Comment for ECE R100

(1)-1 Title

Proposal

correct to read:

UNIFORM PROVISIONS CONCERNING THE APPROVAL OF VEHICLES WITH REGARD TO SPECIFIC REQUIREMENTS FOR THE ELECTRIC POWER TRAIN **IN-USE SITUATION**

(1)-2 Scope

Proposal

correct to read:

This regulation applies to in-use safety requirements ~~The following prescriptions apply to safety requirements~~ with respect to the electric power train of road vehicles of categories M and N, with a maximum design speed exceeding 25 km/h, equipped with one or more traction motor(s) operated by electric power and not permanently connected to the grid and the high voltage components and systems which are galvanically connected to the high voltage bus of the electric power train.

This regulation does not cover safety requirements of post crash safety requirements of road vehicles.

Justification

However the title and scope of R100 may be misleading to contain the post-crash issue, because the title and scope don't exclude post-crash situation clearly.

So Japan supposes that we should add the words of 'in-use' to the title and scope.

(2) Definition

Proposal

correct to read:

2-1 "Active driving possible mode"

Vehicle mode when application of pressure to the accelerator pedal (or activation of an equivalent control) **or release of the brake system** will cause the electric power train to move the vehicle.

Justification

Vehicle may move due to creep when the brake system is released without applying pressure to the accelerator pedal.

(3) Transitional Provisions

Proposal

Insert the new paragraph 11.5.

11.5. Notwithstanding the transitional provisions above, Contracting Parties whose application of this Regulation comes into force after the date of entry into force of the most recent series of amendments are not obliged to accept approvals which were granted in accordance with any of the preceding series of amendments to this Regulation.

Justification

Japan would like to adopt 02 series of this regulation. This paragraph is proposed in accordance with

“GENERAL GUIDELINES FOR UNECE REGULATORY PROCEDURES AND TRANSITIONAL PROVISIONS IN UNECE REGULATIONS / Annex 1. AIDE-MEMOIRE /2.1 VEHICLES AND VEHICLE SYSTEMS /TRANSITIONAL PROVISIONS/V.9”. (TRANS/WP.29/1044)

(4) Exception of Marking

Concern

5-1 Marking

However, this provision shall not apply to any of the following cases

- where barriers or enclosures cannot be **accessed**, unless other vehicle components are removed with the use of tools.

⇒ How can we judge whether the barriers or enclosures are accessible without removing components?

Originally, it was;

- where barriers or enclosures cannot be **disassembled, opened or removed**, unless other vehicle components are removed with the use of tools.

(5) Other

Corrigendum: Footnote of the figure of IPXXB

Current

Tolerances on dimensions without specific tolerance:

- on angles: $0/-10^\circ$
- on linear dimensions: up to 25 mm: $0/-0.05$ mm
over 25 mm: $0/-0.2$ mm

Both joints shall permit movement in the same plane and the same direction through an angle of 90° with a 0 to $+10^\circ$ tolerance.



Correction

Tolerances on dimensions without specific tolerance:

- on angles: $0/-10^\circ$
- on linear dimensions: up to 25 mm: $0/-0.05$ mm
over 25 mm: ± 0.2 mm

IEC 60529: $0/-10^\circ$

ECE R100: $0/-10^\circ$

ECE seems to be correct.

Simply an error.