

Proposal for amendments to ECE/TRANS/WP.29/GRSG/2014/32 **(Proposal for amendments to Regulation No. 39 - Speedometer)**

I. Proposal

Paragraph 2.6. and footnote 2/, amend to read:

"2.6. "Odometer" means that part of the odometer equipment which is **designed to** indicates to the driver the total distance ~~travelled~~ recorded by **his** ~~their~~ vehicle since it was first put into service. 2/

^{2/} This does not include the speed **and distance**-indicating parts of a tachygraph if this complies with type approval specifications which do not permit an absolute difference between true and indicated speed which is higher than the values resulting from the requirements in paragraph 5.3. below."

Delete new paragraph 2.6.1.:

~~"2.6.1. "Technical constant of the odometer" shall mean the relationship between the input revolutions or pulses and the distance travelled by the vehicle."~~

II. Justification

1. Referring to a travelled distance is a first step into the introduction of technical requirements into R39 regulation. As introducing requirements is not the expressed purpose of the proposal, the expected displayed information must refer to a more neutral terminology.
 2. On heavy goods vehicles the odometer information depends on the tachygraph which is the owner of the information. Thus #2 footnote 2/ that is related to speedometer must be extended to odometer.
 3. As mileage fraud is no longer mentioned in the justification, and as there is no use done of the technical constant definition in the proposed requirements then there is no need to define what a technical constant is.
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