

## **OICA comments on ECE/TRANS/WP.29/GRE/2016/10**

1. UN Regulations are regularly amended to introduce optional functions/devices that contribute positively to safety. Some of those evolutions have been introduced, or even are introduced, only in the latest series of amendments. This prohibits the use of those new beneficial technologies in earlier series. This is an issue.
2. Indeed, today, in many countries, earlier series of UN Regulation No. 48 (e.g. 03 series, 04 series, or even 02 series) are admitted as equivalent to national regulation or accepted as minimum regulatory level. This will probably intensify with IWVTA.
3. In those countries, vehicle manufacturers that intend to install optional devices that provide additional performance to increase safety or improved driver assistance need to provide approvals based on latest levels of UN Regulation No. 48. This increases so excessively the costs per vehicle that the vehicle, especially an entry-level, would not be competitive anymore on the market. Thus, in those countries, current regulations are de facto a barrier to the installation of those new beneficial technologies.
4. The solution proposed by GTB should be acceptable to all Contracting Parties as it balances well all the needs. In particular, safety is guaranteed by the fact that the optional equipment installed optionally by the vehicle manufacturers must comply with all requirements applicable to this equipment in latest series of Regulations No. 48 (e.g. emergency stop signal, sequential activation of direction indicators, automatic activation of hazard warning signal, etc.).
5. Besides, it creates the conditions for the introduction of equipment beneficial to safety in countries which have chosen to not yet impose the strictest levels of requirements in force in Europe.