

Draft Supplement 1 to UN R139 (Brake Assist Systems)

OICA proposal to amend ECE/TRANS/WP.29/2018/60

a) Proposal

Paragraph 5.1, amend to read:

“5.1 Vehicles **submitted to approval to UN R139** shall be equipped with a brake assist system meeting the functional requirements specified in paragraph 6. of this Regulation. Compliance with these requirements shall be demonstrated by meeting the provisions of paragraphs 8. or 9. of this Regulation under the test requirements specified in paragraph 7. of this Regulation. In addition to the requirements of this Regulation, vehicles shall also be equipped with ABS in accordance with the technical requirements of UN Regulation No. 13-H.”

b) Justification

Specifications for Brake Assist Systems (BAS) were originally included in UN R13H. However, these systems were never meant to be mandatorily fitted to vehicles for UN R13H approval, but were considered as "if fitted" requirements (e.g. Paragraph 4.4.3. specified that "In the case of a vehicle complying with the Electronic Stability Control and Brake Assist System requirements of Annex 9 to this Regulation ..."). BAS systems were subsequently transferred to a new UN Regulation (UN R140) in order to respect the "if fitted" principle under IWVTA.

OICA understands that the aim of document ECE/TRANS/WP.29/2018/60 is to prevent a vehicle not equipped with BAS to get a UN R139 approval. OICA agrees with this aim, but fears that the proposed wording "Vehicles shall be equipped ..." risks to be misunderstood as being a mandatory installation requirement for all Contracting Parties applying UN R139 without mandating it.

OICA consequently proposes a slight modification to the proposal to clarify the aim. This will not prevent individual (or regional) Contracting Parties to apply UN R139 on a mandatory basis if they so wish.
