Comments on TRANS/WP.29/GRE/2004/21, the joint German and French Proposal  
(Transmitted by the experts from Japan)

A. PROPOSAL

Since the only condition defining "Emergency braking" is "with a deceleration at the physical limits of tyre adhesion to the road surface", the following should be added to the definition in paragraph 2.27:

"2.27. … or with a deceleration of 6 m/s² or more".

B. JUSTIFICATION

On an ordinary dry road surface, the ABS is generally set to activate at a deceleration of 7 m/s² or more, but it is often the case that a deceleration of 6 m/s² or more can be generated without causing the ABS to activate. On a rougher road surface, a deceleration of as high as 10 m/s² can be generated without ABS activation.

Accordingly, if "emergency braking" is defined only in terms of deceleration causing tire slippage which is equivalent with deceleration causing ABS activation, "emergency braking" despite its urgent nature will cause the ABS to activate.

As the results of Japan's recent study indicated a deceleration of 6 m/s² or more to be an appropriate definition of "emergency braking", the experts from Japan have elected to add a deceleration of 6 m/s² or more as alternative definition of "emergency braking" so as to include "emergency braking" cases without ABS activation.

For reference, the above-mentioned results of Japan's study were submitted by the experts from Japan to the 51st GRE meeting and are described in Informal Document No. 9 of 51st GRE.