

Comment on A Course of Discussion on the VDS

Transmitted by the expert from JAPAN

The VDS has been discussed at the informal meetings and the proposal of “TRANS-WP29-GRSG-2003-26” stipulates the degradation of vehicle speed and the prevention of engine restart; and, the current discussions of the informal meetings are mainly focusing on the degradation of vehicle speed.

Japan, on the other hand, believes that the prevention of engine restart alone would have certain effects and help preventing vehicle theft. In particular, it would be seen that there are a few differences of opinions among Member States with regard to the specification of prevention of engine restart, which would lead to a relatively easy regularization. Therefore, we hope to speed up establishment of the regulation by promptly introducing provisions for the remote immobilizer.

We hereby propose to precede the discussion on the prevention of engine restart among VDS functions, and to amend the regulation of immobilizer by adding new provisions for the remote control.

The followings are important for the regulation regarding the prevention of the engine start of the after theft vehicle as vehicle design standards:

- (1) The prevention should not start under the situation which has a harmful effect on safety for the passengers and road traffic.
- (2) Unauthorized user should not be able to start the prevention or cancel the prevention.
- (3) The prevention and/or cancellation of the prevention should not occur unintentionally by such as malfunction.

The operation of the system (e.g. who send the command) is the matter to be described
in each country or regional economic organization.

Proposal

The following proposals are stated based on TRANS/WP.29/1031. The amendment proposals are provided as follows, we hope that they will be discussed in the coming meetings.

Paragraph 6.1.11 (Part II) and 8.1.1(Part IV) amend to read;

- 6.1.11 Immobilizer means a device, which is intended to prevent the vehicle being driven away powered by its own engine. However, functions, devices and facilities to send the unset device defeasance command by remote control, in order to defeat the unset device, are not included.
- 8.1.1 Immobilizer means a device, which is intended to prevent the vehicle being driven away powered by its own engine. However, functions, devices and facilities to send the unset device defeasance command by remote control, in order to defeat the unset device, are not included.

Insert a new paragraph 8.3.6. to read;

- 8.3.6. Defeasance of the unset device
- 8.3.6.1. One or more unset device(s) of immobilizer may be defeated by remote control or detecting unauthorized use of the vehicle (e.g. machine destruction, disconnection of a supply or communication line).
- 8.3.6.2. Timing to start the defeasance of the unset device
- Defeasance of the unset device shall be started in one or a combination of the following condition. Other conditions giving an equivalent safety level are permitted.
- 8.3.6.2.1. When the ignition is switched off and the vehicle's door lock position is changed from unlocked to locked.
- 8.3.6.2.2 When the ignition is switched off continuously for one hour or more.
- 8.3.6.2.3. When the ignition is switched off and the interference to prevent the unset device defeasance is detected, such as detection of power-off.
- 8.3.6.3. Immobilizer, which is equipped with remote controlled defeasance of unset device, shall not defeat the unset device by remote controlled command to other vehicle by the methods such as preparing ID

codes equivalent to the total number of vehicles manufactured.

8.3.6.4. Defeasance of the unset device by remote control or cancellation of the defeasance shall be achieved by one or a combination of the following devices. Other devices giving an equivalent performance are permitted.

8.3.6.4.1. A key pad for inputting an individually selectable code having at least 10,000 variants.

8.3.6.4.2. Electrical and electronic device (including remote control). In this case, electrical/electronic device with at least 50,000 variants and shall incorporate rolling codes and/or have a minimum scan time of ten days.

8.3.6.5. Functions, which relate to the unset device defeasance, shall be confirmed that the status of unset device defeasance (defeated or not) is not changed during test of 8.4. performed in accordance with 8.3.3.

Paragraph 8.3.6., 8.3.6.1., 8.3.6.2 renumber as paragraph 8.3.7, 8.3.7.1, 8.3.7.2., and paragraph "8.3.6.1", amend the reference to paragraph 8.3.7.2 to read "8.3.7.1."