

REPORT of the PASSENGER VEHICLE GTR INFORMAL WORKING GROUP ON BRAKING

The Group held two meetings since the last GRRF, No 3, in September in Geneva and a 4th meeting held in the Netherlands last week. The PVGTR Sub-working Group held a 3rd meeting in Paris during December and produced proposals for consideration by the larger Informal Group.

Informal Group meeting No.3 considered proposals developed in Washington during the summer. The GTR was accepted as being an integrated document comprising a **requirements** section similar to Regulation 13-H and a detailed **test procedures** section having a layout taken from FMVSS 135.

The Group agreed, in Geneva, to a timing plan aimed at producing the complete text of the GTR-braking early in 2006 and this has been the target.

Given the agreement on the layout and structure of the GTR it became clear that some differences between a Self-certification document and a Type Approval document could not be avoided.

As a first solution it was agreed that the differences would best be accommodated by attaching a Type Approval Annex on to the base regulation as used for Self-certification.

The Annex would list the special conditions applicable to any Type Approval regime but it was seen to be important to keep the items in this Annex to a minimum. Candidates envisaged for inclusion may consist of Annex 4 documentation requirements and special parameter declarations or calculation data such as that used to illustrate braking distribution. The use of carefully worded optional paragraphs might be an acceptable alternative to this Type Approval Annex.

The Sub-working group had discussed many of the contentious issues and made proposals to the Informal Group seeking the vital ratification of issues that could be agreed, so as to allow the Group effort to move on to further issues.

The time-scale envisaged does not allow for all issues to be repeatedly discussed but a rapid agreement and decision making process not been realised.

The issues which have been agreed are concerned only with requirement details and may be considered trivial but even these keep being raised again. No agreement has been reached on the main issues and this may be explained by an examination of the differences in philosophy applied to rulemaking between North America and Europe.

USA has special rules requiring evidence of accidents or safety problems in the field to justify adding any new requirements which also need to be capable of being tested. This has not been the approach underlying the development of the 1958 Regulations where new requirements are added to improve braking systems in an effort to forestall any safety problems in future vehicle operations.

In this climate, reaching agreement on the means of aligning these contending Regulations, has tended to call for a relaxation of the requirements in Reg.13-H. Typically ABS rules, Unbraked Trailer rules and the inclusion of new technology system rules cause particular difficulty as contracting parties applying Reg.13-H are objecting to any dilution of present rules.

In an effort to find a solution to this impasse, it was proposed that the GTR should, except where direct conflicts exist, comprise the requirements of both Reg.13-H and FMVSS 135. This would then become a Regulation for a 'Premium Braking System' and would be operated by manufacturers seeking world-wide cover. Different areas would then decide whether to retain local regulation standards in addition to the GTR.

It is clear that this GTR would have requirements similar to the current Reg.13-H and have a 135 style test sequence as proposed in the 'work in progress' document PVGTR2005-2.

There was however, some reluctance to accept this fall-back position and the meeting in NL continued in the attempt to resolve the difficult issues but without a commitment to compromise this proved to be largely unattainable.

It was decided to end the Sub-working Group meetings and hold instead, more Informal Group meetings since the same discussions were being repeated at both levels and there was little acceptance of the Sub-working Group proposals.

Disappointing though this situation might be, given the comparable basic braking performance levels, advice from GRRF or AC3 now appears to be needed on which route forward should, be followed in consideration of the stated problems.