Introduction

OICA welcomes and generally supports the report submitted by the WP.29 Informal Group on Intelligent Transport Systems, and congratulates the Chairmen on their handling of a difficult and complicated subject.

The Informal Group carried out an comprehensive review of the issue of in-vehicle ITS, taking into account the work already performed by the auto industry, including that performed on aspects of the Human Machine Interface. OICA is pleased to note that the review took into account the fact that most of these technologies are still at a relatively early stage of development, and recognised that regulatory action affecting them would therefore largely be premature.

Nevertheless, OICA has some relatively minor comments to the draft report, which are reproduced below in bold and strike-through.

OICA comments to ECE/TRANS/WP.29/2007/23

Chapter 1. - ACTIVITIES UP TO NOW:

Paragraph 2, amend to read:
"2. The issues to be addressed in relation to these technologies are, for example, that, if they are introduced into the market without appropriate safety consideration given to them, their safety benefit may be reduced or even become negative; on the other hand, it is equally important not to hinder their future development may be hindered. It is necessary, therefore, to develop a common understanding on safety among countries concerning the need for regulation and certification of these technologies, and so on. We are now at a stage where it is essential for WP.29 to reach a clear understanding make efforts to address these issues."

Justification: some wording changes are suggested to clarify the link between the needed safety considerations and the need to enable further development of new technologies. Some further editorial changes are suggested

Paragraph 5, amend to read:
"5. It should be noted that the Terms of Reference define the subject of discussion as "In-Vehicle ITS, which are on-board systems for safety that utilize information that is received from direct sensing and/or telecommunications via the road infrastructure or other sources". In other words, ITS technologies refer to all the technologies to improve vehicle safety and realize smooth and comfortable transportation by using functions of vehicles and/or surrounding environment, in particular, the infrastructure. Among these technologies, the performance of the in-vehicle systems that support the driver in interaction with him/her has direct or indirect..."
impact on vehicle safety. **Therefore, what WP.29 should seek is to treat such vehicle safety performance in an appropriate manner in its regulations (See Hungary’s comments).**

*Justification:* OICA does not understand the purpose of this new statement which was not discussed by the Informal Group, and believes that, as mentioned elsewhere in this report, a regulatory approach is at least premature.

**Chapter 2. - EXCHANGE OF VIEWS ON IN-VEHICLE ITS**

**Paragraph 18**, amend to read:
"18. Mr. Jean Christophe Riat (PSA) of OICA reported on a system, adopted by some vehicles on the market as option, that detects lanes with infrared sensors and warns the driver as soon as the drift from their lane by vibrating the seat. In discussion, some members expressed concern about the confusion that might be caused among drivers by the presence of various types of warning systems on the market, stating that international harmonization was necessary."

*Justification:* simple editorial correction

**Paragraph 20**, amend to read:
"20. Further, Mr. Halland (AUTOLIV) of CLEPA reported on integrated safety systems to be activated under pre-crash condition, indicating that CMBS and advanced air-bag systems would be effective as systems automatically activated under such condition. The import of the report regarding CMBS was mostly the same as that of the report of ASV mentioned earlier. It stated that, under condition where collision is no longer avoidable, it is effective to reduce collision speed by automatic brakes. As to advanced air-bag systems, it was of opinion that, by deploying air bags before collision, important effect might be expected on damage mitigating injury reduction even in high-speed collisions. The report mentioned that the recognition of obstacles was important in both systems and hoped for further development of sensor technologies."

*Justification:* clarification that advanced air bags are aimed at reducing human injuries.

**Paragraph 25**, amend to read:
"25. As to these systems, we have not yet any common policy widely shared. Meanwhile, there is some delegates expressed concern about confusion that might be caused among drivers by the presence of various types of warning systems on the market. It is hoped that a certain method for quantitatively evaluating these systems will be developed based on knowledge of HMI and in such a manner not to hinder advances in technologies. The IHRA-ITS WG currently studies the possibility of conducting part of their activities in such direction.

*Justification:* clarification that the concerns relating to possible confusion were expressed by some members, but were not shared by others.

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