

OICA statement concerning the Chairman's proposal on ASEP
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OICA welcomes the Chairman's initiative to strive for a consensus on ASEP and finalize the long and hard work on this issue. OICA is of the opinion, that the work on ASEP must come to a conclusion, to allow OEMs sufficient lead time before application of the new regulation to assess the consequences of ASEP and prepare countermeasures where needed. The Chairman's paper is seen as a good basis to reach this consensus. We are confident, that this broad approach can be streamlined and can result in an easy-to-use-method that covers all crucial points.

The Chairman's paper well reflects the several discussions, proposals and decisions, which have been brought up during the last 16 sessions of the ASEP-Informal Working Group, and combines various aspects that have been discussed during this process.

OICA welcomes, that the ASEP method, which has been worked out by the informal working group, remains the basis for a final solution. OICA however wants to point out some issues, which will have a major impact for our products:

1. Some vehicle types like full electrical or light commercial vehicles should be exempted from ASEP in general, because an expected benefit of ASEP for the environment is highly questionable.
2. OICA can accept the tough limit of 5dB/1000rpm as maximum slope if the ASEP requirement is restricted to 2nd and 3rd gear. The maximum slope of 5dB/1000rpm is not reasonable for gear ratios higher than the 3rd gear.
3. The limited slope of 5dB/1000rpm can become critical for "uncritical cars". We therefore propose to introduce a general margin of 3 dB instead of only 2 dB as proposed in 25.b (i).
4. The method described in 25.b (ii) is expected to be an interesting and design-neutral alternative to the established ASEP-method.
5. The modification of the acceleration to 3m/s² in Annex 3 risks diluting the representativeness of the revised test procedure for real urban traffic. OICA is opposed to this change. If GRB insists on this modification, the impact on the noise output and the impact on the EU-Noise-Level-Database must be taken into account in the course of the discussion of noise limit values for Annex 3. The average noise level increase is estimated of approx. 0,5dB when changing the acceleration to 3m/s², but can peak in more than 1dB in worst case.
6. The requirements of the proposed KBA method are enclosed in the ASEP method according to the definition of the boundary conditions in 25.a. Performing the KBA test in addition to the ASEP test does not bring an additional benefit.

With the above proposed changes, OICA believes that ASEP can be fulfilled by future car generations. In any case, an appropriate lead time is necessary to develop new cars according to these specifications.

OICA asks to well consider these remarks and asks to find a well balanced regulation that can be supported by whole GRB.
