

DAIMLER

Mutual Recognition of Certificates between Technical Services



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Issue:

Exchange of test results between TS of system supplier and TS of vehicle manufacturer

- Within the 1958 or 1998 agreement no uniform procedure is established for the exchange of test results among the technical service providers.
- The German Federal Department of Motor Vehicles (KBA) has described a procedure for the its area of responsibility.

Rules for designation/recognition of test laboratories (KBA)

- The designated body is obligated to
 - Use competent personnel (see Annex 3); authorized signatories and technical experts are to be designated according to a documented procedure
 - Make sure that authorized signatories ensure that tests are carried out appropriately²²
 - Only consider external test data and/or test reports for test reports which are to be used in the TAP, if these are handed over by a TS designated for the respective scope by the KBA and the measured data/(part of) test report was created in accordance with the applicable technical/approval-relevant legislation²³
 - Use virtual testing methods only if
 - This is explicitly permitted for the respective scope by the designation body
 - The virtual test procedure is sufficiently validated
 - Data is received from a TS which is designated for virtual testing in the relevant scope and the receiving TS has assured that the virtual testing procedure is sufficiently validated
 - The authorized signatory has given evidence that he/she is able to judge data from virtual testing appropriately

²² This includes that they ensure that tests are carried out by only qualified personnel of the TS and that they can at any time be included on-site in the test process and can intervene. They should judge the test conditions themselves and monitor the test process appropriately.

²³ The receiving TS is responsible for the correctness of the received measuring data/(parts of) test reports.

Area of responsibility

Rules for designation/recognition of test laboratories (KBA)

- Unfortunately those rules only apply in the area of responsibility of the KBA. Therefore more issues regarding the recognition of test results in areas of responsibilities of other European approval authorities are to be expected.
- For the preparation of the reports according to ECE-R 13, annex 18, we already rely on the cooperation of the various technical services (TS). The system suppliers (e.g. Bosch, Knorr, WABCO) generate electronics certificate. The brake type approval for the vehicle manufacturer is sometimes done by a technical service provider other than that of the supplier. Therefore the mutual recognition of the reports is mandatory.
- Our experience shows that even within the area of responsibility of the KBA issues and delays occur when recognizing reports of other TS. This results in documents being forwarded late and thus the entire approval process being delayed.

Recurring issues

- The following issues can often be observed:
 - Test reports are not signed by an authorized employee of the TS.
 - Tests have not been accompanied & conducted by authorized employees of the TS.
 - Documentation of the test is incomplete.
 - Documentation of the test results is incomplete.
 - Content of the test report is unclear or incomprehensible.
 - Documents referred to in the test reports are not or only reluctantly included in the documentation.
- However, the biggest issue is the transfer of the reports between the technical services itself. On the one hand the documents are sent only reluctantly and on the other hand the cost discussion arises.
- The procedure of the mutual recognition of test reports should be addressed due to the formal reasons as well as for reasons of practicality.