



**EUROPEAN COMMISSION**  
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL  
Industrial Innovation and Mobility Industries  
**Automotive industry**

Brussels, 7 October 2011  
D(2011) KS/iv - 1164916

To the attention of

Mr Onoda  
(co-sponsor of the WLTP process)  
Via email to [onoda-t2r3@mlit.go.jp](mailto:onoda-t2r3@mlit.go.jp)

**WLTC driving pattern**

Dear Mr Onoda,

In July of this year a first draft version of the WLTC was presented and discussed at various informal working groups of WLTP-DHC. This draft WLTC was generated from world wide driving data according to a method developed and agreed by WLTP-DHC and was subject to a first validation, mainly for its driveability.

The design of this draft WLTC was intensely debated by European experts, based on experience from validation tests, simulations and comparison with selected European driving statistics. Unfortunately many experts have raised severe doubts about the representativeness of the current draft WLTC for European and even worldwide driving. As you know, the need to deliver highly representative fuel consumption and CO<sub>2</sub> emission figures for regulators and consumers powers the European commitment to the WLTC development and there is a high level of public awareness in this respect. Therefore we have to take the concerns of our experts very seriously.

From a European perspective one reason for the identified shortcomings could be that the statistical methodology applied by WLTP-DHC for the construction of the WLTC from global driving data coincidentally under-represents driving dynamics and is not appropriate for the extra high speed part. More time is needed to analyse this and possible other issues.

The European Commission is fully aware that the final result must represent the interests of all contracting parties, which requires a certain degree of compromise. But it is also under the legal obligation to deliver a driving cycle, which is sufficiently representative for European conditions. In this context the introduction of elements, which would allow the regions to adapt the cycle dynamics to the local conditions and vehicle characteristics, could be considered. It should also be noted that in the future the driving styles in many Asian countries will probably become more dynamic due to more powerful vehicles and

improvement of the road infrastructure and this development is not reflected in the current driving data.

We therefore suggest the following proceedings:

- Until mid October WLTP-DHC should develop a revision of the roadmap, due to a delay of about 3 months for the start of validation 2 (i.e. start in January 2012 instead of October 2011). Given the tight timeline of the project this will most likely result in a corresponding delay of the final GTR with respect to the current planning.
- The European Commission will perform a more detailed comparative analysis of the draft WLTC with driving cycles constructed from European data only and other driving statistics. Based on this analysis the EU will communicate to WLTP a European position on how the problems of representativeness could be solved until end October 2011.
- During November and December 2011 positions of the contracting parties participating in the WLTP process should be discussed and negotiated with a view to agreeing on a WLTC that could be validated as from January 2012.

Such revised roadmap would also provide more time for taking into account all other comments on the draft WLTC before the start of validation 2 and therefore render validation testing more efficient. I hope you can agree to this European Commission proposal and want to assure you that the development of a globally harmonised test cycle, which should be sufficiently representative for all participating regions, remains our objective.

(electronically signed)  
Philippe Jean  
Head of Unit

Cc: (via email, with the request to distribute this letter to members of respective groups),

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