

Transmitted by the expert from OICA

Proposal to amendments to document AEBS/LDWS-11-02-Rev.1

A. Proposal

Paragraph 1, amend to read (footnote 1 remains unchanged):

“1 Scope and purpose

This Regulation applies to the approval of vehicles of category **M₂, N₂, M₃ and N₃**^{1/} **equipped with a pneumatic braking system and pneumatic rear suspension** with regard to an on-board system to mitigate or avoid a rear-end in lane collision^{2/}.

^{1/} As defined in Annex 7 to the Consolidated Resolution on the Construction of Vehicles (R.E.3) (document TRANS/WP.29/78/Rev.1 as last amended by Amend.4).”

Add a footnote 2/, to read:

“^{2/} **The vehicles of the following categories shall be excluded from the scope of this Regulation:**

- **Special purpose vehicles as defined in RE.3**
- **Vehicles which comply with the definition of CATEGORY G – Off-road vehicles, as defined in RE.3**
- **Vehicles of category M3 Classes I, II, A and articulated busses.**”

B. Justifications

OICA accepts the inclusion of the vehicles of categories M2, N2 as from the 1st step of the introduction of AEBS in the 58 Agreement Regulation, as a sign of willingness to compromise, subject to the specification that the scope applies only to the vehicles equipped with a pneumatic braking system and a pneumatic rear suspension.

Furthermore, special purpose vehicles, defined in RE.3 as vehicles of category M and N for the conveyance of passengers or goods and for performing a special function for which special body arrangements and/or equipment are necessary, shall be excluded because the installation of the AEBS sensor are not compatible with the usage of this category (additional equipment in front of the sensor – snowplough, refuse collector, etc.)

Vehicles which comply with the definition of Category “G” shall be excluded because the specification for the installation of the AEBS sensor are not compatible with the usage of this category (namely, the maximum height of radar installation must be below 800 mm, the environment must be radio wave friendly – no steel bumper, no experience of AEBS with these vehicles, vibrations and shocks, etc.)

Vehicles of category M3 Classes I, II, A and articulated busses : using AEBS complying with the requirements of this draft Regulation, in urban environment, would initiate frequent unnecessary system reactions (warnings + braking) when the driver is aware of the situation. It would also bring annoyance to the driver and the passengers, and even be source of danger to the standing passengers.