



iWVTA

Reference to CEL Annex in R13H-split, ESC and BAS

Informal document for GRRF 76th session, February 2014



Background

- At GRRF-75, OICA presented informal document GRRF-75-39
- OICA was concerned R13H split may create a specific issue with CEL:
 - duplication and additional workload to repeat CEL approval for ESC and BAS in both R13H and independent regulations
 - conflicting interpretations of CEL requirements by different CPs / between each regulation
- OICA proposed different options to solve the issue and sought for guidance from GRRF
- GRRF delegates were requested to send inputs to OICA
- Based on inputs received and on further joint work with CLEPA, OICA / CLEPA agreed on one option and drafted a concrete proposal



Reminder of the different options

Option 1: CEL present in each regulation

- R13H, ESC and BAS regulations include and call CEL Annex, **AND**

Option 1A

- ESC and BAS regulations propose two alternatives:
 1. Fulfilling CEL Annex, or
 2. the applicant demonstrates the Systems are already covered by R13H-CEL approval

Option 1B

- Braking system, ESC and BAS regulations propose two alternatives:
 1. Fulfilling CEL Annex, or
 2. Functions or sub-systems being subject to CEL requirements may be demonstrated by CEL annex of another regulation.

Option 2: CEL present in R13H only

- Only R13H includes and calls CEL Annex, **AND**
- R13H CEL Annex covers all complex electronic control systems including ESC and BAS



Pros and cons

Option 1: CEL present in each regulation

Option 1A

- Includes option 2
- Offers more flexibility vs option 2 for the approval of ESC and BAS

Option 1B

- Includes option 2 and 1A
- Offers more flexibility vs option 1A for the R13H approval

Option 2: CEL present in R13H only

- Same as today
- Lack of flexibility

All options offer same safety level

→ the most flexible option is selected: 1B



Proposal

ESC and BAS regulations

5.5. The safety aspects of the BAS system shall be assessed by one of the following options:

by demonstrating compliance with the provisions of Annex 6 to this Regulation;

or

by demonstrating compliance with the provisions of Annex 8 of UN Regulation N°13H as an integral part of the braking system.

R13H-Split

5.1.3. The requirements of Annex 8 shall be applied to the safety aspects of all complex electronic vehicle control systems which provide or form part of the control transmission of the braking function included those which utilize the braking system(s) for automatically commanded braking or selective braking.

However, systems or functions, which use the braking system as the means of achieving a higher level objective, are subject to Annex 8 only insofar as they have a direct effect on the braking system.

For systems or functions covered by a separate regulation the requirements of Annex 8 are deemed to be fulfilled if the applicant demonstrates that these systems or functions have been assessed according to provisions related to the safety aspects of Complex Electronic Vehicle Control Systems of that Regulation. If such systems are provided, they must not be deactivated during type approval testing of the braking system.”