Proposal for amendments to Regulation 79 Annex 6 (Note: comments describe reasons for individual amendments)

Annex 6

SPECIAL REQUIREMENTS TO BE APPLIED TO THE SAFETY ASPECTS OF COMPLEX ELECTRONIC VEHICLE CONTROL SYSTEMS

1. GENERAL

This annex defines the special requirements for documentation, fault strategy and verification with respect to the safety aspects of Complex Electronic Vehicle Control Systems (paragraph 2.3. below) as far as this Regulation is concerned.

This annex may also be called, by special paragraphs in this Regulation, for safety related functions which are controlled by electronic system(s).

This annex does not specify the performance criteria for "The System" but covers the methodology applied to the design process and the information which must be disclosed to the technical service, for type approval purposes.

This information shall show that "The System" respects, under normal and fault conditions, all the appropriate performance requirements specified elsewhere in this Regulation.

*Involvement of the technical service at an early stage in the design process is recommended for an effective assessment of "The System" to the requirements of this Annex.*

2. DEFINITIONS

For the purposes of this annex,

2.1. "Safety concept" is a description of the measures designed into the system, for example within the electronic units, so as to address system integrity and thereby ensure safe operation even in the event of an electrical failure. The possibility of a fall-back to partial operation or even to a back-up system for vital vehicle functions may be a part of the safety concept.

2.2. "Electronic control system" means a combination of units, designed to co-operate in the production of the stated vehicle control function by electronic data processing. Such systems, often controlled by software, are built from discrete functional components such as sensors, electronic control units and actuators and connected by transmission links. They may include mechanical, electro-pneumatic or electro-hydraulic elements. "The System", referred to herein, is the one for which type approval is being sought.
2.3. "Complex electronic vehicle control systems" are those electronic control systems which are subject to a hierarchy of control in which a controlled function may be over-ridden by a higher level electronic control system/function. A function which is over-ridden becomes part of the complex system.

2.4. "Higher-Level control" systems/functions are those which employ additional processing and/or sensing provisions to modify vehicle behaviour by commanding variations in the normal function(s) of the vehicle control system. This allows complex systems to automatically change their objectives with a priority which depends on the sensed circumstances.

2.5. "Units" are the smallest divisions of system components which will be considered in this annex, since these combinations of components will be treated as single entities for purposes of identification, analysis or replacement.

2.6. "Transmission links" are the means used for inter-connecting distributed units for the purpose of conveying signals, operating data or an energy supply. This equipment is generally electrical but may, in some part, be mechanical, pneumatic or hydraulic.

2.7. "Range of control" refers to an output variable and defines the range over which the system is likely to exercise control.

2.8. "Boundary of functional operation" defines the boundaries of the external physical limits within which the system is able to maintain control.

3. DOCUMENTATION
3.1. Requirements
The manufacturer shall provide a documentation package which gives access to the basic design of "The System" and the means by which it is linked to other vehicle systems or by which it directly controls output variables. The function(s) of "The System" and the safety concept, as laid down by the manufacturer, shall be explained. Documentation shall be brief, yet provide evidence that the design and development has had the benefit of expertise from all the system fields which are involved. For periodic technical inspections, the documentation shall describe how the current operational status of "The System" can be checked.

3.1.1. Documentation shall be made available in two parts:

(a) The formal documentation package for the approval, containing the material listed in paragraph 3. (with the exception of that of paragraph 3.4.4.) which shall be supplied to the technical service at the time of submission of the type approval application. This will be taken as the basic reference for the verification process set out in paragraph 4. of this annex.

(b) Additional material and analysis data of paragraph 3.4.4. which shall be retained by the manufacturer, but made open for inspection at the time of type approval.
3.2. Description of the design process methodology and functions of "The System"

A description should be provided of the methodology applied for the design of "The System", which includes the processes and standards followed within the design and development life cycle, for example for the automotive industry these may include ISO 26262, MISRA C and Automotive SPICE. The application of the methodology shall be demonstrated by an assessment report established by a competent authority. This may include a certificate of accreditation issued by an accreditation body.\[EMJ2\]

A description shall be provided which gives a simple explanation of all the control functions of "The System" and the methods employed to achieve the objectives, including a statement of the mechanism(s) by which control is exercised.

3.2.1. A list of all input and sensed variables shall be provided and the working range of these defined.

3.2.2. A list of all output variables which are controlled by "The System" shall be provided and an indication given, in each case, of whether the control is direct or via another vehicle system. The range of control (paragraph 2.7.) exercised on each such variable shall be defined.

3.2.3. Limits defining the boundaries of functional operation (paragraph 2.8.) shall be stated where appropriate to system performance.

3.3. System layout and schematics

3.3.1. Inventory of components.

A list shall be provided, collating all the units of "The System" and mentioning the other vehicle systems which are needed to achieve the control function in question.

An outline schematic showing these units in combination, shall be provided with both the equipment distribution and the interconnections made clear.

3.3.2. Functions of the units

The function of each unit of "The System" shall be outlined and the signals linking it with other units or with other vehicle systems shall be shown. This may be provided by a labelled block diagram or other schematic, or by a description aided by such a diagram.

3.3.3. Interconnections

Interconnections within "The System" shall be shown by a circuit diagram for the electric transmission links, by a piping diagram for pneumatic or hydraulic transmission equipment and by a simplified diagrammatic layout for mechanical linkages.

3.3.4. Signal flow and priorities
There shall be a clear correspondence between these transmission links and the signals carried between Units. Priorities of signals on multiplexed data paths shall be stated wherever priority may be an issue affecting performance or safety as far as this Regulation is concerned.

3.3.5. Identification of units

Each unit shall be clearly and unambiguously identifiable (e.g. by marking for hardware and marking or software output for software content) to provide corresponding hardware and documentation association.

Where functions are combined within a single unit or indeed within a single computer, but shown in multiple blocks in the block diagram for clarity and ease of explanation, only a single hardware identification marking shall be used. The manufacturer shall, by the use of this identification, affirm that the equipment supplied conforms to the corresponding document.

3.3.5.1. The identification defines the hardware and software version and, where the latter changes such as to alter the function of the Unit as far as this Regulation is concerned, this identification shall also be changed.

3.4. Safety concept of the manufacturer

3.4.1. The manufacturer shall provide a statement which affirms that the strategy chosen to achieve "The System" objectives will not, under non-fault conditions, prejudice the safe operation of systems which are subject to the prescriptions of this Regulation.

3.4.2. In respect of software employed in "The System", the outline architecture shall be explained and the design methods and tools used shall be identified. The manufacturer shall be prepared, if required, to show some evidence of the means by which they determined the realisation of the system logic, during the design and development process.

3.4.3. The Manufacturer shall provide the technical authorities with an explanation of the design provisions built into "The System" so as to generate safe operation under fault conditions. Possible design provisions for failure in "The System" are for example:

(a) Fall-back to operation using a partial system.
(b) Change-over to a separate back-up system.
(c) Removal of the high level function.

In case of a failure, the driver shall be warned for example by warning signal or message display. When the system is not deactivated by the driver, e.g. by turning the ignition (run) switch to "off", or by switching off that particular function if a special switch is provided for that purpose, the warning shall be present as long as the fault condition persists.
3.4.3.1. If the chosen provision selects a partial performance mode of operation under certain fault conditions, then these conditions shall be stated and the resulting limits of effectiveness defined.

3.4.3.2. If the chosen provision selects a second (back-up) means to realise the vehicle control system objective, the principles of the change-over mechanism, the logic and level of redundancy and any built in back-up checking features shall be explained and the resulting limits of back-up effectiveness defined.

3.4.3.3. If the chosen provision selects the removal of the Higher Level Function, all the corresponding output control signals associated with this function shall be inhibited, and in such a manner as to limit the transition disturbance.

3.4.4. The documentation shall be supported, by an analysis which shows, in overall terms, how the system will behave on the occurrence of any one of those identified hazards or faults which will have a bearing on vehicle control performance or safety.

This may be based on a Failure Mode and Effect Analysis (FMEA), a Fault Tree Analysis (FTA) or any similar process appropriate to system safety considerations.

The chosen analytical approach(es) shall be established and maintained by the Manufacturer and shall be made open for inspection by the technical service at the time of the type approval.

The technical service shall perform an audit of the application of the analytical approach(es). The audit shall include:

- Inspection of the safety approach at the concept (vehicle) level with confirmation that it includes consideration of interactions with other vehicle systems. This may be based on a Hazard and Operability analysis (HAZOP) or any similar process appropriate to system safety.
- Inspection of the safety approach at the system level. This may be based on a Failure Mode and Effect Analysis (FMEA), a Fault Tree Analysis (FTA) or any similar process appropriate to system safety.
- Inspection of the validation plans. This may include Hardware in the Loop (HIL) testing and vehicle on-road operational testing with expert and/or non-expert drivers or any similar testing appropriate for validation.

The audit shall consist of spot checks of selected hazards and faults to establish that argumentation supporting the safety concept is understandable and logical and validation plans are suitable and have been completed.

Recommendations may be made for tests to be performed in paragraph 4 to verify the safety concept.

3.4.4.1. This documentation shall itemize the parameters being monitored and shall set out, for each fault condition of the type defined in paragraph 3.4.4. of this annex, the warning signal to be given to the driver and/or to service/technical inspection personnel.

3.4.4.2 This documentation shall describe the resistance of ‘The System’ to environmental influences, e.g. climate, mechanical resistance and electromagnetic compatibility.
4. VERIFICATION AND TEST

4.1. The functional operation of "The System", as laid out in the documents required in paragraph 3., shall be tested as follows:

4.1.1. Verification of the function of "The System"
As the means of establishing the normal operational levels, verification of the performance of the vehicle system under non-fault conditions shall be conducted against the manufacturer's basic benchmark specification unless this is subject to a specified performance test as part of the approval procedure of this or another Regulation.

4.1.2. Verification of the safety concept of paragraph 3.4.
The reaction of "The System" shall, at the discretion of the type approval authority, be checked under the influence of a failure in any individual unit by applying corresponding output signals to electrical units or mechanical elements in order to simulate the effects of internal faults within the unit.

It is recommended that these tests include aspects that impact on vehicle controllability and user information (HMI aspects).

4.1.2.1. The verification results shall correspond with the documented summary of the failure analysis, to a level of overall effect such that the safety concept and execution are confirmed as being adequate.

5. REPORTING BY TECHNICAL SERVICE

Reporting of the audit by technical service shall be performed in such a manner that allows traceability, e.g. versions of documents inspected are coded and listed in the records of the technical service.

An example of a possible layout for the report from the technical service to the type approval authority is given in the template below (Note KBA reporting template Nr. 01-05):
Type-Approval Procedure
Information System of the German Type-Approval Authority

0. General data

0.1 Vehicle make:

0.2 Type:

0.3 Identification mark: (if applicable)

0.4 Name and address of the manufacturer:

0.4.1 Name and address of the appointee:

0.5 Information folder or documentation

No.: 

Date of issue:

Date of last update:
Type-Approval Procedure
Information System of the German Type-Approval Authority

1. Test vehicle(s) / object(s)

1.1 General description: N.B.: Information to be provided either here or as an attachment

General description of the complex electronic system with its main components and functions, as well as brief explanation of the safety concept and of the possibility of testing the operating condition of the system as part of the periodic technical inspections (see, for instance, ECE Regulation 13, Annex 18, paragraph 3.1)

1.2 Description of the control function: N.B.: Information to be provided either here or as an attachment

Specific description of all control functions and
- list of all input and measurement variables,
- list of all output variables,
- boundaries within which the system functions
(see, for instance, ECE Regulation 13, Annex 18, paragraph 3.2)

1.3 Description of the components: N.B.: Information to be provided either here or as an attachment

Specification (in list form) of the discrete functional units with their respective
- combinations of assembly in the system,
- linkages and signal flow priorities,
- information regarding the identifiability of hardware and software (see, for instance, ECE Regulation 13, Annex 18, paragraph 3.3)

2. Manufacturer’s safety concept N.B.: Information to be provided either here or as an attachment

2.1 Manufacturer’s declaration:

The manufacturer(s) XXX has/have confirmed that the strategy chosen for the achievement of the objectives of the “system”, assuming flawless conditions, does not interfere with the safe operation of parts of the equipment required under this regulation (e.g. braking device) (see appendix).
Type-Approval Procedure
Information System of the German Type-Approval Authority

2.2 Hard and Software development:
Specification of the documents in which the software development process is described. Description/diagram of the software development process including the software design factors.

2.3 Function in case of errors in the system:
General description of the fallback, change or shut-off functions and any possible partial operation functions, including their conditions and boundaries of their effectiveness in the event of any failures in the "system"
Description of the simulated malfunction.

2.4 Analysis of the behavior of the "system" in case of errors:
Description of the results and confirmation by the Technical Service that the corresponding documentation (for instance in accordance with ECE Regulation 13, Annex 18, paragraph 3.4.4) can be accessed by the approval authority through the manufacturer under its reference number XXXX.
Specification of the documents evidencing the verification of the fault-free performance of the vehicle system in operation.

2.5 Resistance against environmental influences:
E.g. type and scope of tests on climate and mechanical resistance and electromagnetic compatibility.

2.6 Testability of the system:
Description of the possibility of testing the operating condition of the system as part of the periodic technical inspections.

2.7 General information:
Test location:
Test date:
Type-Approval Procedure
Information System of the German Type-Approval Authority

2.8 Comments:

3. Appendices:

Appendix 1: e.g. list of changes
Appendix 2: e.g. general description regarding 1.1
Appendix 3: e.g. manufacturer’s declaration regarding 2.1
...

4. Final certificate
Statement of conformity

The information folder referred to under item 0.5. and the type described therein — do con form — to the above-mentioned test specification.

This test report consists of pages 1 to 5.

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TEST LABORATORY

accredited by the Accreditation Office of the Federal Motor Vehicle Department,
Federal Republic of Germany

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