

Proposal for transitional provisions for inclusion in UN R79 (ECE/TRANS/WP29/2017/10, as amended by WP29-171-06)

I. Proposal

Insert a new paragraph 12, to read:

- "12. Transitional provisions
- 12.1 As from the official date of entry into force of the 02 series of amendments, no Contracting Party applying this UN Regulation shall refuse to grant or refuse to accept UN type approvals under this UN Regulation as amended by the 02 series of amendments.
- 12.2 As from 1 September 2018, Contracting Parties applying this UN Regulation shall not be obliged to accept UN type-approvals to the preceding series of amendments, first issued after 1 September 2018.
- 12.3 Until 1 September 2024, Contracting Parties applying this UN Regulation shall accept UN type-approvals to the preceding series of amendments, first issued before 1 September 2018.
- 12.4. As from 1 September 2024, Contracting Parties applying this UN Regulation shall not be obliged to accept type-approvals issued to the preceding series of amendments to this Regulation.
- 12.5. Notwithstanding paragraph 12.4, Contracting Parties applying this UN Regulation shall continue to accept UN type-approvals issued according to the preceding series of amendments to this UN Regulation, for the vehicles/vehicle systems which are not affected by the changes introduced by the 02 series of amendments.
- 12.6. Until 1 September 2020, type approvals may be granted according to the 02 series of amendments to this UN Regulation to new vehicle types not complying with the red colour for the hands-off warning signal, mandated in paragraph 5.6.2.2.5., and having multi information displays installed in the instrument cluster not capable of indicating red warning signals or using standalone tell-tales only
- 12.7. Contracting Parties applying this UN Regulation shall not refuse to grant UN type-approvals according to any preceding series of amendments to this UN Regulation or extensions thereof."

II. Justification

An agreement was reached in the ACSF informal group (shared by D, J, UK, F, S, NL, KOR, OICA, CLEPA), to introduce the requirements for CSF, ACSF-A and ACSF-B1 through a supplement to the current version of the regulation, while taking care to explicitly clarify with GRRF and WP29 that the existing types and their subsequent extensions won't be affected by the new technical requirements (see informal document GRRF-83-21 for complete background). The target of the group was indeed to regulate new systems coming to the market, and not to impact existing systems.

At the end of the 83rd session of GRRF, and contrary to the decision of the 82nd session, it was decided to introduce the provisions of GRRF-83-08 through a 02 series of amendment instead of a supplement 6 to 01 series. See extract from GRRF-82 report: “56. *GRRF adopted GRRF-82-12-Rev.3, subject to confirmation in January 2017 by GRRF, and requested the secretariat to submit it to WP.29 and AC.1 as a draft Supplement 6 to the 01 series of amendments to Regulation No. 79 (Steering equipment) for consideration and vote in March 2017.*”. Informal document GRRF-83-08-rev2 was adopted without transitional provisions; however, a discussion took place on the application date to Existing types: the European Commission proposed 2021, while industry suggested a date not earlier than 2024, subject to confirmation.

Since GRRF-83 session, industry confirmed the date of 2024 for Existing Types. Apart from the fact that the decision of GRRF-82, subsequently confirmed by the ACSF informal group, was to introduce the provisions by a supplement and to clarify with GRRF that the existing types and their subsequent extensions won't be affected, the justifications for a date of 2024 for the existing types are mainly based on the following technical and regulatory rationales:

- A date of introduction of April 2018 for New Types will conflict with the forthcoming adoption of IWVTA. Industry hence proposes to turn this date to September 2018.
- Furthermore, this would provide slightly more time for OEMs to comply with these requirements, especially for already frozen designs.
- These new technical requirements impact 100% of the models equipped with CSF/ACSF functions, which represents 100% of the volumes for some OEMs, and almost all OEMs selling vehicles on the UNECE markets.
- All CSF and ACSF functions existing today are impacted (i.e. not only LKAS but also lane departure avoidance, ESC by steering, side wind compensation, park assist, remote parking control etc.), as well as those which are ready for market introduction.
- The technical impacts are heavy and will request industry to reapprove and redesign all these functions, for example in the case of LKAS:
 - Hands-off detection
 - Hardware and software changes to avoid false detection
 - Development and verification of new algorithms, new software etc.
 - On-road validation of system robustness
 - Modification of the instrument cluster
 - Implementation of new test procedures possibly on new test tracks (@ OEM and technical Sces)
 - Reapproving some CSF functions as ACSF.
 - Industrial, commercial and After-sale impacts
- Some current CSF functions may no longer be covered by the new CSF definition, e.g. Emergency steering functions (ESF), which will create a problem when reapproving the vehicles to the 02 series, the issue being that the provisions for these ESF functions are undefined today.

As a consequence, an earlier date than 2024 may lead to temporarily remove some functions/models from the market, which would on the principle jeopardise systems which are often beneficial for safety, while never detrimental. Such a situation is not acceptable for industry, all the more as one target of the group was to regulate new systems coming to the market, and not to heavily impact existing systems which are beneficial for safety (e.g. with short lead-times leading to deletion from the market).

Finally, OICA proposes to use the standard wording for transitional provisions, as agreed in the IWVTA informal group, taking into account that Revision 3 to the 1958 Agreement is due to enter into force on 15 September 2017.