OICA wishes to raise a physical difficulty in complying with existing testing provisions in the Regulation and would propose a solution:

ECE Regulation N° 39 requires that, if a roller dynamometer is used for testing speedometers, the diameter of the rollers be at least 2 m. This means that large and new investment for very expensive testing equipment is necessary; most countries will refrain from acquiring such equipment just for the speedometer test and will resort to actual running tests.

Since these outdoor tests are susceptible to weather conditions, however, it would be the best to conduct an indoor speedometer test on a chassis dynamometer currently used for emission tests. In reality this is not possible, because the diameter of the chassis dynamometer rollers is much smaller than 2 m as the minimum of only 0.4 m is required by ECE Regulation 40 and ECE Regulation 47.

We consequently propose that minimum diameter of the rollers in paragraph 5.2.6.2 of ECE Regulation 39 be amended from 2 m to 0.4 m, so that the chassis dynamometers currently used by vehicle manufacturers for emission tests may be used for speedometer tests as well.

Current paragraph:

5.2.6.2.: if a roller dynamometer is used for the test, the diameter of the rollers should be at least 2 m

Proposed paragraph:

5.2.6.2.: if a roller dynamometer is used for the test, the diameter of the rollers should be at least 0.4 m