

Japan's Comments on ECE/TRANS/WP.29/GRRF/2006/34,
an amendment proposed to Regulation No. 13

1. Demonstrative test method

Paragraphs 2.1.3. and 2.2.3., Annex 21, refer to the demonstrative test method for approval and stipulates that "Until unified test procedures are agreed, the method by which this demonstration is carried out shall be agreed between the vehicle manufacturer and the Technical Service." In our opinion, a specific time limit should be imposed here such as "within five years from the date of enactment of the regulation."

2. Accuracy of the simulation model

Paragraph 2, Annex 21, Appendix 2, refers to the validation of the simulation model. We find that the requirements for validation are insufficient. We propose that a requirement be added that the simulation model reproduce more or less vehicles' behavior (jackknifing, drift, etc.) under uncontrolled critical conditions and effects under controlled conditions."

3. Vehicle types to which the mandatory installation requirement is applicable

The proposal says that the vehicle types to which the mandatory installation requirement is applicable are specified in the main text of the Regulation No. 13, but the Regulation No. 13 gives an impression that the Annexes are something independent from the regulation, e.g. Annexes 19 and 20.

We are afraid that, by removing "when mandated" from the header, the proposal might cause the requirement to be applied to all the vehicle types or also to optional vehicles types. We believe hence that the vehicle types to which the mandatory installation requirement is applicable should be specified also in Annex 21.

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