

I. Proposal for amendments to ECE/TRANS/WP.29/2011/94 (Supplement 9 to the 11 series of amendments to Regulation No. 13) taking into account the proposal contained in WP.29-155-06

Paragraph 1.1.2.1. of Part 2 to Annex 19 amend to read:

"The **vehicle manufacture** / system manufacturer shall supply..."

Paragraph 1.1.3.1. of Part 2 to Annex 19 amend to read:

"...defined in the **vehicle manufactures** / system manufacturer's information document....
...paragraph 2.1. of the **vehicle manufacturers** / system manufacturers information
document."

Paragraph 1.1.3.2. item (s) of Part 2 to Annex 19 amend to read:

"(s) ...be carried-out using **vehicle manufacturer** / system manufacturer test data..."

Paragraph 1.1.3.2. item (t) of Part 2 to Annex 19 amend to read:

"(t) ...covered in the ~~system manufacturer's~~ information document..."

Paragraph 1.1.3.2. item (u) of Part 2 to Annex 19 amend to read:

"(u) ...covered in the ~~system manufacturer's~~ information document..."

Paragraph 1.1.3.2. item (x) of Part 2 to Annex 19 amend to read:

"(x) ...utilising **vehicle manufacturer** / system manufacturer's test data..."

Paragraph 1.1.3.2. item (y) of Part 2 to Annex 19 amend to read:

"(y) ...installation envelop ~~as specified by the system manufacturer~~ to be evaluated;"

Paragraph 1.1.3.2. item (z) of Part 2 to Annex 19 amend to read:

"(z) ...installation envelop ~~as specified by the system manufacturer~~ to be evaluated."

Paragraph 1.1.4.1. of Part 2 to Annex 19 amend to read:

"...agreed upon between the **vehicle manufacturer** / system manufacturer and the
Technical Service..."

Paragraph 1.1.4.1.10. of Part 2 to Annex 19 amend to read:

"...to confirm the installation envelop specified by the **vehicle manufacturer** / system
manufacturer."

Paragraph 1.1.4.1.11. of Part 2 to Annex 19 amend to read:

"...to confirm the installation envelop specified by the **vehicle manufacturer** / system
manufacturer."

Item 1.1. of Annex 19 Appendix 11 amend to read:

"Name of **vehicle manufacturer** / system manufacturer"

Footnote 1 of Annex 19 Appendix 12 amend to read:

"**Vehicle manufacturer** / system manufacturer test data..."

II. Justification

It is appropriate that a system manufacturer is able to initiate a test report in conjunction with a technical service, otherwise the use of the Annex 19 Part 2 procedure is restricted to large motor vehicle manufacturers.

Motor vehicle manufacturers in the small and medium enterprise (SME) category do not have the resources to carry-out the work that is necessary in generating a test report in accordance with Annex 19 Part 2 – the testing of a wide range of vehicles to cover the 20 items that need to be evaluated under both low co-efficient of adhesion conditions (e.g. winter testing in Sweden or Finland) and high co-efficient of adhesion conditions (e.g. summer testing in France or Germany) – and are, therefore, discriminated against unless a system manufacturer is able to carry-out this work.

A system manufacturer is able to carry-out this work on the basis that a wide range of vehicles are available during the validation and application engineering phases and by anticipating future demand for the system.

Therefore, it should be possible for a system manufacturer to have a technical service generated test report in accordance with the technical requirements of Annex 19 Part 2 without the involvement of a motor vehicle manufacturer.

To achieve and to clarify that a motor vehicle manufacturer may also use the Annex 19 Part 2 procedure, regardless of whether to the motor vehicle manufacturer is also a system manufacturer, the following amendments are proposed:

1. As clarification that the vehicle manufacturer can initiate a test report, whether or not the vehicle manufacturer is also the system manufacturer, the wording “vehicle manufacture” is combined with “system manufacturer” (paragraphs 1.1.2.1., 1.1.3.1., 1.1.3.2.(s), 1.1.3.2.(x), 1.1.4.1., 1.1.4.1.10., 1.1.4.1.11. of Annex 19 Part 2 and paragraph 1.1. of Annex 19 Appendix 11).
2. In the case where there is no benefit in combining vehicle manufacturer with system manufacturer, system manufacturer is deleted to simplify the text (paragraphs 1.1.3.2.(t), 1.1.3.2.(u), 1.1.3.2.(y) and 1.1.3.2.(z) of Annex 19 Part 2).
3. In footnote 1 to Appendix 12 of Annex 19, vehicle manufacturer is added and system supplier is change to system manufacturer to maintain consistency.