Proposal for amendments to ECE/TRANS/WP.29/GRRF/2014/11 (Draft BAS Regulation)

I. Proposal

Paragraph 5.5., replace to read:

- "5.5. The safety aspects of the system shall be assessed by one of the following options:
 - (a) by demonstrating compliance with the provisions of Annex 6 to this Regulation;

or

(b) by demonstrating compliance with the provisions of Annex 8 of UN Regulation N°13-H as an integral part of the braking system"

Paragraphs 5.6., amend to read:

- "5.6. Provisions for the periodic technical inspection of **electronic** brake assist systems
- 5.6.1. It shall be possible at a periodic technical inspection to confirm the correct operational status by visual observation of the warning signals following a power-on.
- 5.6.2. At the time of type approval, the means implemented to protect against simple unauthorized modification of the operation of the warning signals shall be confidentially outlined. Alternatively, this protection requirement is fulfilled when a secondary means of checking the correct operational status is available."

II. Justification

- 1. Paragraph 5.5.:
- (a) The proposed changes must be read together with the amendments to UN Regulation No. 13-H.
- (b) The objective of the proposed wording is to avoid redundant certification of the CEL aspects of BAS according to both BAS and UN Regulation No. 13-H (keeping unchanged the level of safety). The philosophy of the proposal is to permit the applicant to show evidence that CEL compliance has already been achieved according to Annex 8 of UN Regulation No. 13-H, as an alternative to demonstrating compliance with the CEL annex of the BAS regulation.
- 2. Paragraph 5.6.:
- (a) Some vehicles are equipped with mechanical brake assist system.
- (b) In this case, no warning signal is provided by the system, thus the requirements of paragraph 5.6.1 do not apply.
- (c) This periodic technical inspection requirement is derived from the requirement of UN Regulation No. 13-H, paragraph 5.1.4.2, prescribed to be applied for complex electronic control systems. Therefore, this is not applicable to a purely mechanical system.