

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

TYPE APPROVAL AUTHORITIES MEETING

MEETING MINUTES

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Attendees:

Austria	Mr. FranzWurst, Mr. Dieter Karl, Mrs. Aingeal Flanagan
Belgium	Mr. Wim Vandenplas, Mr. Jacques Van Den Berghe
Bulgaria	Mrs. Iliyana Atanasova, Mr. Georgi Georgiev, Mrs. Milena Atanasova
Estonia	Mr. Meelins Munt
European Commission	Mr. Wolfgang Schneider
Finland	Mr. Björn Ziessler, Mr. Marko Sinerkari
France	Mrs. Aurelie Papes, Mr. Lionel Mis, Mr. Thierry Bourdillon
Germany	Mr. Frank Wrobel; Mr. Mark Wummel
Hungary	Mr. Akos Pajor
Iceland	Mr. Einar Einarsson
Italy	Mr. Antonio Erario
Latvia	Mr. Janis Liepins
Luxembourg	Mr. Romain Lamberty, Mr. Claude Liesch
Netherlands	Mr. Harry Jongenelen, Mr. Freek Plancius
Norway	Mr. Erik Sætre
Poland	Mr. Jerzy W.Kownacki, Mr. Jerzy Krol
Slovenia	Mr. Robert Jeroncic
Spain	Mr. Victor Costa, Mr. Javier Fadrique, Mr. Ignacio Blanco Mr. Luis Carlos Anton Chumillas (only 29.9.06)
Sweden	Ms. Ingela Sundin; Ms. Tanja Vainionpaa
Switzerland	Mr. Stefan Wenger
Turkey	Mr. Erhan Ünsal, Mr. Necmettin Tokur
United Kingdom	Mr. Derek Jones, Mr. Gareth Jones, Mr. John Bragg

AGENDA

- 1. Opening of the meeting**
- 2. Adoption of the Agenda**
- 3. Adoption of the minutes from Dublin, April 2006**
- 4. Follow up on actions from the Dublin meeting**
(Dublin 8.2) 2003/37/EC: Agricultural Tractors
(Dublin 9.2) R115 - Scope and type criteria and families
- 5. General Items**
New attendees from Countries outside the EU
- 6. Items relating to framework directive 70/156/EEC (motor vehicles)**
New vehicle type, 70/156/EEC
New vehicle, 70/156/EEC
National Type approval documents, 70/156/EEC
Multistage approval process, 70/156/EEC
WVTA information folder, 70/156/EEC
Mobile machinery, 70/156/EEC
Applicability of amendments to WVTA included in separate directives in case ECE-
Reqs are used, 70/156/EEC
Equivalence EEC and ECE Tyre road noise approvals, 70/156/EEC and ECE-R117
Inertia overrun brake systems, 71/320/EEC
Modification of vehicles, 76/115/EEC, 74/408/EEC, 77/541/EEC
Safety belts and restraint systems, 77/541/EEC
Tyre road noise, tyre types, 92/23/EEC
Tyre road noise approvals, 92/23/EEC
Component failure of couplings, 94/20/EC
Couplings with two functions, 94/20/EC
Side Impact, Speed-related automatic central door locking, 96/27/EC
Busses, Service doors, 2001/85/EC
Dimension tolerance, Directive 71/221/EEC or 2001/85/EC
Indirect Vision, Obstruction allowed for field of view, 2003/97/EC
Pedestrian protection, Information on granted approvals, 2003/102/EC
Recyclability of vehicles, certificates from other TAA, 2005/64/EC
Frontal Protection Systems, Interpretation of Annex 1, Par. 2.1.9, M1, 2005/66/EC
Frontal Protection Systems, Interpretation of Annex 1, Par. 2.1.9, N1, 2005/66/EC
Emissions, OBD Interface Tools, 2005/61/EC
Emissions Euro 5, registration, 2005/55/EC

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

- 7. Items relating to framework directive 92/61/EEC and 2002/24/EC (motor cycles)**
 - Numbering of vehicle type-approvals, 2002/24/EC
 - Signature on COC's, 2002/24/EC
 - Persons authorised to sign the COC's, /24/EC
 - EC type approval number and date in COC's, 2002/24/EC (also Dir. 70/156/EEC and 2003/37/EC)
 - Modifying of VIN, 93/34/EEC
 - Installation of lighting and light-signalling devices, 97/24/EEC
 - External projections, 97/24/EC Chapter 3
 - Replacement exhaust test requirements, 97/24/EEC (2005/30/EC)
 - Replacement catalytic converters, 2005/30/EC

- 8. Items relating to framework directive 74/150/EEC and 2003/37/EC (agricultural and forestry tractors)**
 - Agricultural tractors, Small series, time validity of type-approval certificate, 2003/37/EC
 - 40 km/h limit for T1-T3 tractors, 2003/37/EC

- 9. Miscellaneous**
 - Short report of the ETAES-Meeting
 - Short report of the Pocket bike sub-group
 - Long timber transports on pole dolly
 - Transportation of Containers
 - Questions relating to ECE-Regulations
 - ECE-R21, Annex 8 Provisions in relation to gear lever
 - ECE-R24, Diesel emission and smoke Part I-III
 - ECE-R30 + ECE-R54, Conformity procedures, substandard tyres
 - ECE-R48, Change of light bulbs
 - ECR-108, Run flat tyres
 - ECE-R117, Tyre road noise, category of use 'special'

- 10. Next meeting (Q2 2007) – Location to be established**

1. Opening of the meeting

Mr Franz Wurst welcomed the delegates to Vienna.

2. Adoption of the Agenda

The agenda was adopted with two amendments. The following items were added to the agenda:

- 6.25 Directive 2005/55/EC on HDV emissions
- 7.10 Directive 2005/55/EC on replacement exhaust systems

3. Adoption of the minutes from Dublin, April 2006

The minutes of the Dublin meeting were adopted as read.

After it had been pointed out by [...] that the minutes of the Dublin meeting had been posted on the Commission website before they had been approved at the TAAM, *Austria* confirmed that the minutes of the Vienna meeting would be circulated for comments after the meeting and would only be posted on the Commission website after they were approved at the next TAAM.

4. Follow up on actions from the Dublin meeting

4.1 (Dublin 8.2) 2003/37/EC: Agricultural Tractors

[...] confirmed that a smoke opacity value is no longer needed for type approval and that the relevant box should be left empty. If a TAA would like to conduct a smoke opacity test, it is free to do so. However, the type approval is valid without the test. These values may be extracted from system approvals and filled into the relevant box. The Directive should be amended.

Decision:

- **A smoke opacity figure needs not to be entered in the approval certificate.**

4.2 (Dublin 9.2) R115 - Scope and type criteria and families

[...] stated that it always obey national law in these cases. Vehicles fulfilling Euro 1 and Euro 2 requirements cannot be certified in accordance with the Euro regulation, but may get national approval.

Decision:

- **The Member States agreed to keep within the range stated.**

5 **General Items**

5.1 **New attendees from countries outside the EU**

Austria reported that the Ukraine had expressed an interest in attending the TAAM and proposed that in order to attend a TAAM, a country must have at least concluded a treaty with the EU regarding certification and recognition of type approval.

Decision:

Only countries that can issue and accept type approval should be allowed to attend TAAMs.

6 **Items relating to Framework Directive 70/156/EEC (motor vehicles)**

6.1 **New vehicle type, 70/156/EEC**

Directive 70/156/EEC; Directive 2003/37/EC; Directive 2002/24/EC

Issue:

The EC directives do not define the term “new vehicle type”. But the transitional/implementing measures under the framework and “separate” Directives stipulate different dates for entering into force of specific requirements depending on making distinction between “new” type and “existing” type.

For instance the enforcement measures according to Art.23 of Directive 2003/37/EC stipulates that:

“1. As regards vehicles belonging to categories T₁, T₂ and T₃, Member States shall apply this Directive to:

(a) **new types** of vehicles from 1 July 2005;

(b) all new vehicles entered into service from 1 July 2009.”

or

Directive 2005/66/EC (Art.3, item 3) defines that:

“3. With effect from 25 November 2006, in respect of a **new type of vehicle** fitted with a frontal protection system, or a new type of frontal protection system supplied as a separate technical unit, which does not comply with the requirements laid down in Annex I and Annex II, Member States shall refuse to grant EC type-approval or national type-approval.”

Question:

We would like to ask Member States to give their comments on the possibility to define **new vehicle type** as:

“a vehicle type which has not been type-approved (ECWVTA) under the respective framework Directive (70/156/EEC – for M₁, 2003/37 – for T₁, T₂ and T₃, 2002/24 – for L) or under national type-approval scheme for the rest of the vehicle categories (EU+EFTA);

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Possibilities of solution:

A	Support the above given definition	
B	Other decision (please specify)	

Decision: "A"

New vehicle type is a vehicle type that is seeking European type approval for the first time

6.2 New vehicle, 70/156/EEC

Directive 70/156/EEC; Directive 2003/37/EC

Issue:

The EC directives do not define the term "new vehicle" but for the purpose of registration provisions for motor vehicles we would like to define the meaning of "new vehicle". In our tax legislation the definition of "new vehicle" is introduced as follows:

"New vehicle" shall be a vehicle for which the following conditions exist simultaneously:

- a) has no permanent road registration until its import into the country or no more than 6 months have expired from the date of its initial registration (including registration abroad); and
- b) has run not more than 6000 km."

Question:

We would like to ask Member States to share their experience bearing in mind possible solutions and practicability of such definition of "new vehicle" for the purpose of type-approval system.

Possibilities of solution, comments:

- It is not necessary the definition for type-approval purposes and definition for tax/registration purposes to be the same. /For purpose of type approval, a new vehicle is a vehicle that is registered for the first time or put on the market in a country for the first time.

6.3 National Type approval documents, 70/156/EEC

Directive 70/156/EEC

Issue:

The whole EC vehicle type-approval for categories M₂, M₃, N and O have not been established yet. For the purpose of registration we need a document verifying compliance with the applicable legislative requirements for the vehicles belonging to these categories (national type-approval).

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Question:

We would like to ask Member States to share their experience of implementing national type-approval schemes in their countries, and in particular:

1. for the purpose of national approval for categories M₂, M₃, N and O, Member States use only harmonized requirements of “separate” Directives or implement any specific national requirements;
2. what kind of document shall accompany each vehicle (which belongs to categories M₂, M₃, N and O) produced in conformity with the approved type in the case of national type approval – is it permissible to bear the title “certificate of conformity” and the format of this document to be the same as the model of certificate of conformity given in Directive 70/156/EEC.

Possibilities of solution:

We consider that:

1. using only harmonized requirements of “separate” Directives for issuing a whole national type-approval for categories M₂, M₃, N and O is a suitable solution and
2. requiring a document titled “certificate of conformity” based on national type-approval scheme for registration purposes (the format of which is compatible with the model under the “framework” Directive but without bearing in the title the letters “EC”) is permissible decision.

A	Support above given solution (items 1 and 2)	
B	Other comment (please specify)	

Comments:

No final decision because the national requirements can be different in some countries. Commission would prefer if countries apply the European requirements (EU Directives) for granting national type-approval for vehicles belonging to categories M₂, M₃, N and O

6.4 Multistage approval process, 70/156/EEC

Directive: 70/156 – 2001/116 EC

Issue

Multistage approval process

Problem

When doing a multistage WVTa the requirements for the first stage could be different than for the second stage depending on the date of the approval.

Imagine we have an incomplete vehicle approved on 2005 with a valid COC and a second manufacturer wants to make a completed vehicle using the first one as base vehicle in 2006.

Imagine the requirements in 2006 for new types in one separate directive are different than were in 2005.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Question

Should the second stage manufacturer fulfil all the requirements for its WVTA even in separate directive coming from the first stage?

Example

First stage: M1 (<2.5 t) incomplete vehicle approved in January 2005 without Pedestrian Protection directive.

Second stage: M1 completed vehicle (ambulance, hearse...) applying for WVTA in January 2006.

Possibilities of solution

Comments

A	Yes, when applying for WVTA second stage vehicle has to fulfil the requirements for new types today.	
B	No, first stage vehicle is still valid as base vehicle.	

Decision: "B"

Comments:

The first stage is considered to be an existing type and the second stage as a "new" type. If there is any separate system approved that have expired (even for existing types) then the vehicle cannot be registered.

6.5 WVTA information folder, 70/156/EEC

Directive: 70/156 – 2001/116 EC

Issue

WVTA information folder

Problem

When a new separate directive comes into force for new registrations no COC could be issued for those vehicles that do not fulfil that particular directive but, could the data from the old directive remain in the WVTA information folder?

Example

Euro IV levels are applicable for M1 (>2.5 t) from 1.10.2006, is necessary to "clean up" the WVTA information folder taking the Euro III engines away before that date?

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Possibilities of solution

Comments

A	Yes, Euro III engines should be removed.	
B	No, because no valid COC is going to be issued by the manufacturer.	

Decision: "B"

Old data should be removed at the next revision or extension.

6.6 Mobile machinery, 70/156/EEC

Article 1 of Directive 70/156/EEC reads:

Scope

This Directive applies to the type-approval of motor vehicles and their trailers built in one or more stages, of systems, components and separate technical units intended for use on such vehicles and trailers.

Article 2 reads:

Article 2

Definitions

For the purpose of this Directive:

[...]

— *vehicle* means any motor vehicle intended for use on the road, being complete or incomplete, having at least four wheels and a maximum design speed exceeding 25 km/h, and its trailers, with the exception of vehicles which run on rails and of agricultural and forestry tractors and all mobile machinery,

— *base vehicle* means any incomplete vehicle, the vehicle identification number of which is retained during subsequent stages of the multistage type-approval process,

— *incomplete vehicle* means any vehicle which still needs completion in at least one further stage in order to meet all the relevant requirements of this Directive,

— *completed vehicle* means a vehicle resulting from the process of multi-stage type-approval which meets all the relevant requirements of this Directive,

[...]

Annex IIA, Chapter 5 of this directive reads:

5. '*Special purpose vehicle*' means a vehicle of category M, N or O for conveying passengers or goods and for performing a special function for which special body arrangements and/or equipment are necessary.

[...]

5.7. '*Other special purpose vehicles*' means vehicles as defined in point 5 with the exception of those mentioned in points 5.1 to 5.6.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

The codifications pertinent to ‘special purpose vehicles’ are defined in Part C of this Annex paragraph 5 to be used for the purpose specified in that Part.

Annex IIC, Chapter 5 reads:

5. Special purpose vehicles

- SA Motor caravans (See Annex IIA, point 5.1)
- SB Armoured vehicles (See Annex IIA, point 5.2)
- SC Ambulances (See Annex IIA, point 5.3)
- SD Hearses (See Annex IIA, point 5.4)
- SE Trailer caravans (See Annex IIA, point 5.5)
- SF Mobile cranes (See Annex IIA, point 5.6)
- SG Other special purpose vehicles (See Annex IIA, point 5.7)

Question:

A mobile machinery (eg a concrete pump) is built on a base vehicle of category N3. Does this vehicle fall under the scope of directive 70/156/EEC?

Directive 71/320/EEC (Brakings) has a clear wording for this case:

In the case of category N vehicles, the equipment and fittings of certain special vehicles not intended for the carriage of passengers (such as crane vehicles, workshop vehicles, publicity vehicles) shall be considered to be goods.



Possibilities of solution

Comments

A	This vehicle falls into the definition of „SG Other special purpose vehicles“ and has to fulfil the requirements of the vehicles covered by directive 70/156/EEC (Table in Annex XI, Appendix 3)	
B	This vehicle is excluded from the framework-directive due to the definition in Article 2 („mobile machinery“). In the following the requirements listed in the Table of Annex XI, Appendix 3 need not to be fulfilled.	

Decision: “A”

Comments: The new framework directive is including this vehicle type, the current 70/156/EEC not. The provisions are still on a national basis.

6.7 Applicability of amendments to WTA included in separate directives in case ECE-Regs are used, 70/156/EEC

Directive 70/156/EEC and 72/245/EEC

Applicability of amendments to WTA included in separate directives in case ECE Regs are used

Issue

Directive 2006/28/EC (EMC) amends both the separate directive 72/245/EEC and the framework directive 70/156/EEC.

The framework directive is changed as follows: Additional information on the frequency of radar systems must be given in the information document Annex I or Annex III and if applicable (for 24GHz systems) in Annex IX (COC).

The ECE Regulation 10 is equivalent to the Directive 72/245/EEC and does not require information on the frequency of radio-systems.

Similar situations may exist with other separate directives that amend the framework directive.

Question:

In case that ECE Regulation 10 is applied to obtain WTA instead of the Directive 72/245/EEC, is it necessary to include item 12.7.1 in Annex I or Annex III WTA information document?

Possibilities of solution

Comments

A	The amendments to the framework directive included in a separate directive are applicable even in case that the ECE Regulation is applied instead of the separate directive	
B	The amendments of the separate directive, including those that amend the framework directive do not apply in case that an ECE Regulation is applied instead of the separate directive	

Decision: “A”

Comment: it doesn't say that the technical service has to verify the figures supplied by the manufacturer.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

6.8 Equivalence EEC and ECE Tyre road noise approvals, 70/156/EEC and ECE-R117,

Directive	: 70/156/EEC in relation to 2001/43/EC and ECE Regulation R117
Subject	: Equivalence EEC and ECE Tyre road noise approvals.

Annex	: IV, Part II, Article 10A
Paragraph	: -
Point	: 46

Text	: <i>Where reference is made to a separate Directive, an approval issued under the following Regulations of the United Nations Economic Commission for Europe (taking account of the scope (1), and the amendment to each of the UN/ECE Regulations listed below) shall be recognised as an alternative to an EC type approval granted under the relevant separate Directive in the table of Part I.</i>										
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">46. Tyres, motor vehicles and their trailers</td> <td style="width: 20%; text-align: center;">30</td> <td style="width: 40%; text-align: center;">02</td> </tr> <tr> <td>46. Tyres, commercial vehicles and their trailers</td> <td style="text-align: center;">54</td> <td style="text-align: center;">00</td> </tr> <tr> <td>46. Temporary-use spare wheels/tyres</td> <td style="text-align: center;">64</td> <td style="text-align: center;">00</td> </tr> </table>	46. Tyres, motor vehicles and their trailers	30	02	46. Tyres, commercial vehicles and their trailers	54	00	46. Temporary-use spare wheels/tyres	64	00	
46. Tyres, motor vehicles and their trailers	30	02									
46. Tyres, commercial vehicles and their trailers	54	00									
46. Temporary-use spare wheels/tyres	64	00									

Question	: Some of our customers would, for practical reasons such as space, like to have an ECE R117 approval instead of a 92/23/EEC – 2001/43/EC Annex V approval. We are not sure if the equivalence is acceptable. The text in 70/156/EEC still leaves room for not applying Annex V at all. Will all Type Approval Authorities accept ECE R117 approvals as equivalent?
-----------------	--

Solutions	A	Directive 70/156/EEC still needs updating and R117 can not be accepted.	Not in line with EU Commission philosophy of Acceptance of “international” law.
	B	ECE R117 approvals must be accepted.	When will 70/156/EEC be updated?

Decision : **“B”** *There was no detailed answer on the expected updating time question.*
Remarks

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

6.9 Inertia overrun brake systems, 71/320/EEC,

Directive	: 71/320/EEC and ECE R13
Subject	: Inertia overrun brake systems.

Annex	: VIII (71/320), 12 (R13)
Paragraph	: 1 (71/320) and 9 (R13)
Point	: 1.6.3. (71/320) and 9.5 (R13)

Text **71/320/EEC:**

- 1.6. *Tests*
- 1.6.1. *Determination of the main characteristics of the brake.*
- 1.6.2. *Determination of the main characteristics of the control device and testing as to whether that device conforms with the provisions of this Directive.*
- 1.6.3. *Testing on the vehicle:*
 - *the compatibility of the control device and the brake*
 - *the transmission.*
- 9.5. *Additional tests*
- 9.5.1. *In the case of inertia braking systems with mechanical transmission, a check shall be made as to whether the rod system by which the forces are transmitted from the control device is correctly fitted.*
- 9.5.2. *In the case of inertia braking systems with hydraulic transmission, a check shall be made as to whether the travel of the master cylinder actuator reaches a minimum level of s/ih. A lower level shall not be permitted.*
- 9.5.3. *The general behaviour of the vehicle when braking shall be the subject of a road test carried out at different speeds, with different levels of brake effort and rates of application; self excited undamped oscillations shall not be permitted.*

:
ECE R13

- 1.6. *Tests*
- 1.6.1. *Determination of essential components of the brake.*
- 1.6.2. *Determination of essential components of the control device and verification of the latter's conformity with the provisions of this Regulation.*
- 1.6.3. *Checking on the vehicle:*
 - (a) *the compatibility of the control device and the brake; and*
 - (b) *the transmission*
- 9.5. *Additional checks*
- 9.5.1. *In mechanical-transmission inertia braking systems a check shall be made to verify that the rod linkage by which the forces are transmitted from the control device to the brakes is correctly fitted.*
- 9.5.2. *In hydraulic-transmission inertia braking systems a check shall be made to verify that the travel of the master cylinder is not less than s/ih. A lower level shall not be permitted.*
- 9.5.3. *The general behaviour of the vehicle when braking shall be the subject of a road test carried out at different road speeds with different levels of brake effort and rates of application. Self-excited, undamped oscillations shall not be permitted.*

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Question : Is a road test required for each vehicle manufacturer, even if the system is supplied by the same component manufacturer?

Solutions	A	The test is to be executed for each vehicle manufacturer and vehicle type.	This seems ridiculous as vehicles and brake system can be expected to have the same behaviour.
	B	The test does not include a performance test (like Type O).	
	C	Once established, an overrun system can be considered OK, this can be included in Appendix 4.	

Remarks : *Existing test data on brake performance may be accepted, but the behaviour of the vehicle must be tested for every type.*

Comment: Solution A was suggested by [...], nobody was against it

6.10 Modification of vehicles, 76/115/EEC, 74/408/EEC, 77/541/EEC
Transformation of vehicles.

Issue

A completed vehicle is modified by an other company.
(e.g. a commercial vehicle is transformed to a minibus – or similar).

Question:

Is it possible to issue a certificate at the name of the company who transformed the vehicle ?

Possibilities of solution

A	It is possible	X*
B	It is not possible	

Decision: “A”

Comments: **It is only possible in the case of multi-stage type approval process when the manufacturer of the stage2 is a vehicle manufacturer.*

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

6.11 Safety belts and restraint systems, 77/541/EEC

RELEVANT SECTION:

DIRECTIVE 77/541/EEC item 2.6.1.2.4.

The text in item 2.6.1.2.4 reads:

In the case of a safety belt with a pre-loading device the minimum displacement specified in point 2.6.1.4.1 below may be reduced by half. For the purpose of this text, the pre-loading device shall be in operation.

QUESTION / PROBLEM / CONCERN:

Item 2.6.1.2.4 refers to item 2.6.1.4.1 for the specified displacement, but item 2.6.1.4.1. treats only restraint systems. The correct reference should be to item 2.6.1.3.2. in which the measurements for displacement are given.

A	The reference in 2.6.1.2.4. is correct	
B	The reference should be corrected as above	

Comments: *The reference given in item 2.6.1.2.4 of Directive 77/541/EEC should be corrected .*

6.12 Tyre road noise, tyre types, 92/23/EEC

Directive	: 2001/43/EC (92/23/EEC)
Subject	: Tyre road noise, tyre types.

Annex	: V TYRE/ROAD NOISE EMISSION
Paragraph	: 2. Definitions
Point	: 2.1. Type of tyre

Text	: 2.1. <i>'Type of tyre' means, in relation to type-approval pursuant to this Annex (tyre/road noise emission), a range of tyres consisting of a list of tyre size designations (see section 2.17 in Annex II), brand names, trade marks and trade descriptions which do not differ in such essential characteristics as:</i> <ul style="list-style-type: none"> - the manufacturer's name - the tyre classification (see section 2.4. of this Annex) - the tyre structure (see section 2.1.4. of Annex II) - the category of use (see section 2.1.3. of Annex II) - for class C1 tyres. Reinforced or Extra Load - the tread pattern (see 2.3 of Information Document, Annex I, Appendix 3).
-------------	--

Question	: In practice there is nowadays mostly no difference in construction between a normal or an extra load tyre with the same tread pattern. The noise levels are also on the same level. Therefore we have considered these tyres as the same type because the carcass structure is also the same and one approval is given covering both normal and extra load.
-----------------	---

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Solutions	A	The directive demands separate approvals for Reinforced or Extra load.	The term XL, often used is not mentioned, how do we distinguish these different types?
	B	Many tyres are not marked with "Reinforced", just a service description with a higher load index than the ETRTO standard. The ETRTO is not mentioned in the Directive and is therefore not binding, so no separate Approvals are needed	
	C	Only tyres marked "Reinforced" must have a separate approval.	

Decision: "C"

6.13 Tyre road noise approvals, 92/23/EEC

Directive : 70/156/EEC and 2001/43/EEC
Subject : Tyre road noise approvals.

Annex : Article 10a
Paragraph : -
Point : 3 and 4

Text : 2001/43/EEC - 6. the following Article shall be inserted:
Article 10a

1. As from 4 February 2003, Member States may not:
 - (a) refuse to grant EC type-approval or national approval for a type of vehicle or type of tyre, or
 - (b) prohibit the registration, sale or entry into service of vehicles, and the sale or entry into service or use of tyres, for reasons relating to the tyres and their fitting to new vehicles, if the vehicles or tyres comply with the requirements laid down in this Directive, as amended by Directive 2001/43/EC.
2. As from 4 August 2003, Member States may no longer grant EC type-approval, and shall refuse to grant national type-approval for those types of tyre which fall within the scope of this Directive and which do not meet the requirements of this Directive, as amended by Directive 2001/43/EC.
3. As from 4 February 2004, Member States may no longer grant EC type-approval or national approval for a type of vehicle, for reasons relating to its tyres or their fitting, if the requirements of this Directive, as amended by Directive 2001/43/EC, are not met.
4. As from 4 February 2005, Member States shall:
 - (a) consider certificates of conformity accompanying new vehicles in accordance with the provisions of Directive 70/156/EEC as being no longer valid for the purposes of Article 7(1) of the said Directive, if the requirements of this Directive, as amended by Directive 2001/43/EC, are not met, and
 - (b) refuse the registration or prohibit the sale or entry into service of new vehicles which do not meet the requirements of this Directive, as amended by Directive 2001/43/EC.
5. As from 1 October 2009, the provisions of this Directive, as amended by Directive 2001/43/EC, shall apply for the purposes of Article 7(2) of Directive 70/156/EC, to all tyres which fall within the scope of this Directive, with the exception of tyres of classes C1d and C1e, to which they shall apply as from 1 October 2010 and 1 October 2011 respectively.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Question	: In past TAAMs it was established that tyre road noise approvals, point 3, could be avoided in EWVTA's by making use of the equivalent ECE Regulations 30 and 54, How about the registration, point 4, does the same principle apply here?
-----------------	--

Solutions	A	EWVTA's must be accepted for registration regardless of point 4.	
	B	It is impossible to start checking all issued EWVTA's and therefore registration can be accepted.	
	C	The tyre road noise requirements are incorporated in the national laws and must therefore be fulfilled.	
Remarks	: Opinion of Member States was that until the wording of the Directive is not modified vehicles can be registered without tyre approval according 2001/43/EC.		

6.14 Component failure of couplings, 94/20/EC

QUESTION / PROBLEM / CONCERN:

This problem concerns approved coupling balls (Class A) in combination with a relatively new type of coupling head (Class B) with locking mechanism in both horizontal and vertical direction (often used on new caravans).

The Class A-device is tested for strength in vertical direction in +15° or -15° angle depending on its construction. The Class A devices fulfil the requirements in the directive. Even the Class B device is tested and approved.

We have had a number of devices that still brakes under use because the test procedure in 94/20/EC does not fully cover the forces in the horizontal direction. The cases that have been found are all the same combination of coupling head/coupling ball.



Are there any more countries that have had these experiences?

Comments:

The Member States did not have such experience – breaking - with the coupling devices. [...] had the information that previously some similar problems appeared and a board of experts examined the matter. These experts concluded that the provisions were insufficient, made suggestions as to how the tests could be improved and submitted these proposals to the UNECE.

6.15 Couplings with two functions, 94/20/EC

Issue

[...] has noticed a special coupling device on the vehicle side. This coupling has a ball (50) for the coupling with a coupling head and additional a clamping device which is normally not necessary for this kind of connection. The clamping device is open, when the ball coupling is connected with the coupling head.

But it is possible to use this coupling as a non-selfacting drawbar coupling (the ball is the pin). The clamping device is to be closed after putting the drawbar eye over the ball (pin). [...] has generally no objections against a kind of double use of a coupling. But we have some objections in this special case. We think that the abrasion of the ball may happen at the greatest diameter of the ball, when the ball is used as a pin and connected with a drawbar eye. This is for this kind of connection (with the drawbar eye) uncritical. But if you use the ball coupling again with a coupling head this abrasion may cause problems.

In our opinion a double use of a coupling device should be not permitted, when an interacting of the safety between the two different kinds of coupling is expected.

Prescription

Directive 94/20/EC

Possibilities of solution

A	The combination of different coupling systems is allowed. The interaction between the different systems must be especially considered.	Not only the two described test procedures in the directive has to be performed. A special view on the abrasion over the life cycle is in this special case necessary.
B	A combination of different coupling systems should not be allowed.	

Decision:

No decision was reached; the question should be discussed on the next TAA meeting again!

6.16 Side Impact, Speed-related automatic central door locking, 96/27/EC

SPEED-RELATED AUTOMATIC CENTRAL DOOR LOCKING

BACKGROUND

At the previous TAAM in Dublin there was a consensus opinion that central door locking must not be activated during a 96/27/EC side impact test with the added comment that, if the central locking is activated during a 96/27/EC side impact test, the vehicle does not meet the requirements of Annex II Section 3.3.2 because it would not be possible to open doors **without tools** after the impact.

ISSUE

This paper now seeks to clarify the TAAM opinion concerning speed-related automatic central door locking systems.

[...] opinion is that, if a manufacture provides auto door locking as a standard (or factory option¹) feature, the Type Approval test should be conducted with the auto locking system activated and that, after the impact, the system must automatically disengage to allow the doors to be opened with out tools.

[¹ Note: The Type Approval worst case process would also take account of the non-auto locking system and if necessary additional test data would be obtained to verify the performance of both conditions]

However, if a manufacturer includes an automatic door locking system in the vehicle specification but sets the factory default to 'off' (and the system is configured so that it can only be activated by the deliberate action of the driver post-registration) does it still need to be considered during the Type Approval process?

LEGISLATION

96/27/EC Side Impact

Annex II

3.3. *Particular requirements*

3.3.1. *No door must open during the test.*

3.3.2. ***After the impact, it must be possible without the use of tools:***

3.3.2.1. **to open a sufficient number of doors provided for normal entry and exit of occupants, and if necessary tilt the seat-backs or seats to allow evacuation of all occupants;**

3.3.2.2. *to release the dummy from the protective system;*

3.3.2.3. *to remove the dummy from the vehicle*

TAAM DISCUSSION

Possibilities of Solution

PART 1

In the case that a speed sensitive automatic central door locking system is specified as a standard (or factory option) feature:

A	The Type Approval side impact test will be conducted with the automatic door locking system activated and, after the impact, the system must automatically disengage to allow the doors to be opened with out tools.
B	It is not necessary to consider the automatic door locking system during the Type Approval side impact test

Decision: "A"

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

PART 2

In the case that a speed sensitive automatic central door locking system is part of the vehicle specification but the factory default condition is 'off' and the system is configured so that it can only be activated by the deliberate action of the driver post-registration:

A	The Type Approval side impact test will be conducted with the automatic door locking system activated and, after the impact, the system must automatically disengage to allow the doors to be opened with out tools.
B	It is not necessary to consider the automatic door locking system during the Type Approval side impact test

Decision: "A"

PART 3

In the case that the TAAM opinion is in support of solution B in either Part 1 and Part 2 above:

A	The Type Approval Authority should require the manufacture to make the following additional provisions to prevent inadvertent de-activation of the automatic locking system: <ul style="list-style-type: none">- Activation of the system will require Specific action by the driver with, for example, a key operated or coded activation process- There should be clear warning in the driver's handbook that activation might restrict a rescuer's easy access to the car interior in the case of an accident- There should be an additional warning in the vehicle to make sure that the driver can always know if the system is activated or de-activated
B	It is not necessary for the Type Approval Authority to require the manufacture to make any additional provisions - the manufacturer will be expected to accept responsibility under product liability legislation.

Comments:

In the first two cases solution "A" was accepted – the question was not valid further.

6.17 Busses, Service doors, 2001/85/EC

Issue:

The service door (s) shall be situated on the side of the vehicle that is nearer to the side of the road corresponding to the direction of the traffic in the country in which the vehicle is to be registered, **or in the rear face of the vehicle** as given in paragraph 1.2.1., Annex VI of Directive 2001/85/EC.

The vehicles, for example, [...], can be manufactured with such interior layout that vehicles the service door is situated in the rear face of the vehicle.

A- Do you grant type approval for such vehicles?

B- Are such vehicles accepted for public transport in your country?

Opinion / comment:

The Member States grant type approval for vehicles with service doors in the rear face of the vehicle.

The Member States accept these vehicles for public transport.

6.18 Dimension tolerance, Directive 71/221/EEC or 2001/85/EC

Issue:

Max height of the first step (for the bus of class B it is 350mm) as given in paragraph 7.7.7., Annex I of Directive 2001/85/EC.

The vehicles, for example [...] with mechanical suspension have this dimension 420mm. These manufacturers declare that after 6 months of use of the vehicle the suspension lowers to the necessary height.

The same concerns rear protective device as given in paragraph 5.4.1., Annex II of Directive 70/221/EEC.

C- Do you accept this?

D- If yes, what is the maximum tolerance?

Decision:

The vehicle must meet the requirements of the directive at the time of approval and as no tolerances are permitted in the directive, no tolerances are permissible for the vehicles.

6.19 Indirect Vision, Obstruction allowed for field of view, 2003/97/EC

ISSUE

The legislation identifies requirements for prescribed fields of vision and it also give a 10% allowance for obstructions caused by the vehicles bodywork and other components fitted to the vehicle. However, it is not totally clear how the field of view obstruction should be calculated.

LEGISLATION

ANNEX II

5.3. Main exterior rear-view mirrors Class III

5.3.1. Exterior rear-view mirror on the driver's side

*The field of vision must be such that the driver can see at least a **4 m wide, flat, horizontal portion of the road**, which is bounded by a plane parallel to the median longitudinal vertical plane and passing through the outermost point of the vehicle on the driver's side of the vehicle and extends from 20 m behind the driver's ocular points to the horizon (see Figure 8). **In addition, the road must be visible to the driver over a width of 1 m**, which is bounded by a plane parallel to the median longitudinal vertical plane and passing through the outermost point of the vehicle starting from a point 4 m behind the vertical plane passing through the driver's ocular points.*

5.3.2. Exterior rear-view mirror on the passenger's side

*The field of vision must be such that the driver can see at least a **4 m wide flat, horizontal portion of the road** which is bounded by a plane parallel to the median longitudinal vertical plane passing through the outermost point of the vehicle on the passenger's side and which extends from 20 m behind the driver's ocular points to the horizon (see Figure 8). **In addition, the road must be visible to the driver over a width of 1 m** which is bounded by a plane which is parallel to the median longitudinal vertical plane and passing through the outermost point of the vehicle starting from a point 4 m behind the vertical plane passing through the driver's ocular points.*

5.8. Obstructions

5.8.2. Exterior mirrors (Classes II, III, IV, V and VI)

*In the fields of vision specified above, obstruction due to the bodywork and some of its components, such as other mirrors, door handles, outline marker lights, direction indicators and rear bumpers, as well as reflective-surface cleaning components, shall not be taken into account if they are responsible for a total obstruction of less than **10 % of the specified field of vision**.*

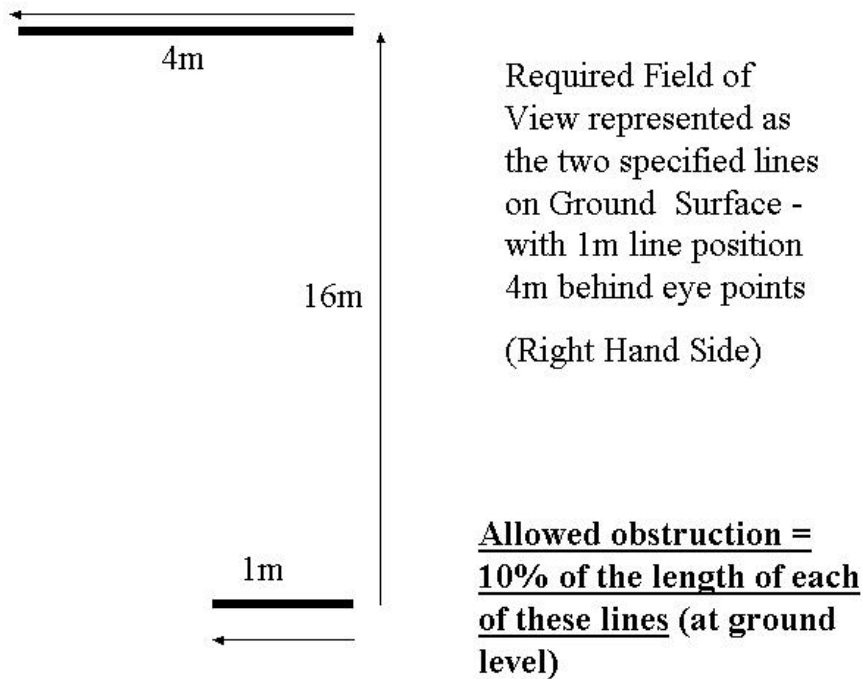
5.9. Test procedure

The field of vision shall be determined by placing powerful light sources at the ocular points and examining the light reflected on the vertical monitoring screen. Other equivalent methods may be used.

TAAM DISCUSSION

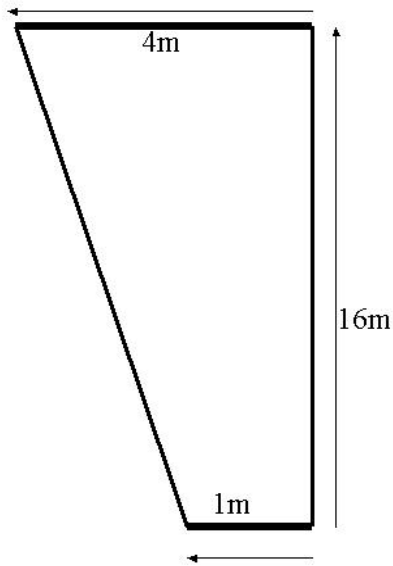
The problem is that the prescribed field of view is specified by reference to 2 horizontal lines on the road surface running perpendicular to the vehicle's fore/aft centre line and the legislation wording for the allowed obstruction could be interpreted in at least three different ways:

Option A: 10% of the length of each of the specified Field of View lines (1m and 4m)



Option B: 10% of total ground area between 1m and 4m lines

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

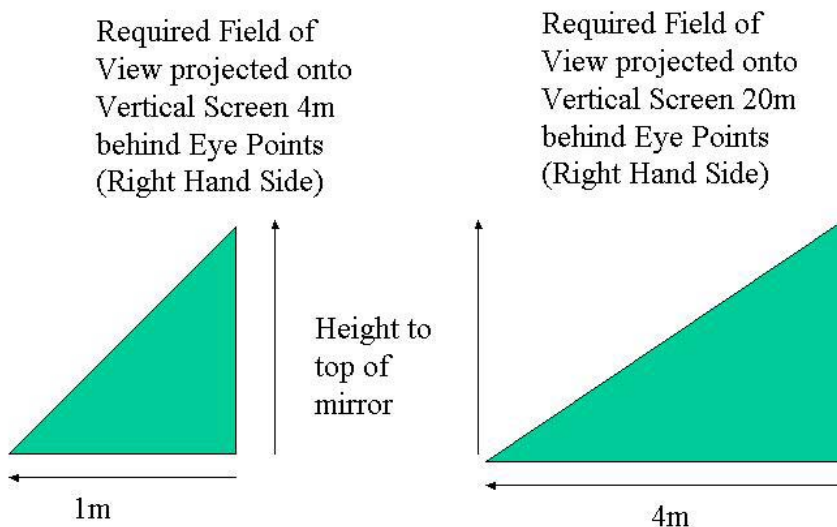


Required Field of View represented on Ground Surface - with 1m line position 4m behind eye points
(Right Hand Side)

Allowed obstruction = 10% of each of this total ground area

Option C: 10% of the prescribed Field of View projected onto a vertical screen positioned 4m behind the Eye Points and 10% of the prescribed Field of View projected onto a vertical screen positioned at 20m behind the Eye Points

(Noting that, although the projected light pattern on the screen will be defined by the mirror shape, the area actually representing the prescribed field of view projected to the horizon is a triangle formed by the prescribed 1m or 4m ground line and a vertical line representing the height to the top of mirror)



Allowed obstruction = 10% of each of these triangles

Possibilities of Solution

A	10% of the length of each of the specified Field of View lines (1m and 4m)
B	10% of total ground area between 1m and 4m lines
C	10% of the prescribed Field of View projected onto a vertical screen positioned 4m behind the Eye Points and 10% of the prescribed Field of View projected onto a vertical screen positioned at 20m behind the Eye Points

Decision:

Solution C is agreed in principle (i.e. obscuration considered as a percentage of the prescribed fields of view projected onto vertical screens) noting that annexe III, paragraph 5.9 provides some flexibility for the exact test method/procedure used.

6.20 Pedestrian protection, Information on granted approvals,2003/102/EC

Issue

In [...] the national regulation for the provisions for vehicles and it's registration [...] allows to make changes to a vehicle in use only if there are valid approvals(international or national) or test reports for those parts to be changed.

Now since the pedestrian protection directive is in force the [...] authorities have to judge the changes which have been made depending a valid 2003/102/EC approval. In the case where a vehicle has got the proved ability to prevent pedestrians being severely injured (valid 2003/102/EC approval) a change of front-parts may infect this ability. The [...] law therefore dictates tests/approvals which prove the same level of safety for this part.

To allow the test labs and part-manufacturers to know which vehicle has a valid 2003/102/EC approval [...] was asked to provide these lists/data.

1. Solutions may be the delivery of an explicit list of granted 2003/102/EC approvals by each TAA or to integrate such an information in ETAES.

Prescription

Directive 2003/102/EC

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Possibilities of solution

Comments

1	A	The TAA will send a list of granted 2003/102/EC approvals, frequently.	
	B	The system approval will be uploaded to the ETAES server.	Simple version! And fast!
	C	Only the normal list of all granted systems every moth is appropriate.	

Comments:

It was not possible to reach a decision on this matter: [...] suggested to send e-mails to all countries for more information. No objection to this solution.

6.21 Recyclability of vehicles, certificates from other TAA, 2005/64/EC

Issue

There is the preliminary assessment of the vehicle manufacturer providing the necessary Quality management and Recycling strategies. Once this certificate is given by one of the MS authorities which are named and recognised the validation can be prolonged for e.g. 2 years.

Now 3 Questions are arising:

2. Has the TAA of the MS, who actually grant the approval according 2005/64/EC for the vehicle type as one of the single approvals to get a WVTA, to accept the preliminary assessment 'certificate of compliance with annex IV' of another TAA?
3. How do the approval authorities react if a certificate of compliance with annex IV is no longer valid. And is the WVTA of this vehicle then to be withdrawn?
4. Which is the best way to inform the TAA to know about the invalidity of such certificates?

Prescription

Directive 2005/64/EC Article 6 and Annex IV

Possibilities of solution

Comments

1	A	The TAA has to accept certificates from other TAA.	
	B	Only the TAA which grants the single approval as a system approval for the WVTA has to provide the certificate of compliance with annex IV.	This will not work out, because the recycling-strategy will be the same for any vehicle type of one vehicle manufacturer.
2	A	The single approval can not be granted and the WVTA is no longer valid! Even the CoC is no longer valid.	
	B	No action is needed the WVTA is still valid, the CoC is still valid for registration.	
3	A	Each TAA who issues certificates has to inform the other TAA about discontinued (invalid) certificates.	
	B	Every TAA who grants the single approval has to verify the validity of the certificates of compliance with annex IV.	

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Decisions:

- Question 1: The TAA granting the approval in accordance with 2005/64/EC for the vehicle type as one of the single approvals to get a WVTA must accept the preliminary assessment 'certificate of compliance with annex IV' issued by another TAA.*
- Question 2: When a certificate of compliance with annex IV is no longer valid, the single approval cannot be granted and the WVTA is no longer valid. Even the COC is no longer valid. Members are invited to submit the name of the authority responsible for recyclability with their comments on the draft minutes.*
- Question 3: Every TAA that issues certificates must inform other TAAs about discontinued (invalid) certificates. TAAs can use the news forum on ETAES for this purpose.*

6.22 Frontal Protection Systems, Interpretation of Annex 1, Par. 2.1.9, M1, 2005/66/EC

ISSUE

The legislation covering Frontal Protection Systems (2005/66/EC) applies to all M1 vehicles up to 3.5 tonnes and to all N1 vehicles.

There is a specific requirement that the fitment of the protection system should not compromise the vehicle's performance in respect of other type approval directives.

The problem is that it is not clear from the legislation which Directives need to be taken into consideration and whether physical tests are required to demonstrate that the fitting of a FPS does not compromise the vehicle's performance.

LEGISLATION

2005/66/EC Annex I

2.1.9. Conformity with the requirements of other vehicle type-approval directives shall not be compromised by the fitting of a frontal protection system

TAAM DISCUSSION

M1 Vehicles

The question is which directives need to be taken into consideration, and how much evidence is required to show that the base vehicle still conforms to other Type Approval directives?

It is relatively easy for a Frontal Protection System manufacturer to demonstrate, for example, that the vehicle's front lamps still meet the lighting/visibility requirements, that the horn is sufficiently loud and that the protection system itself meets the exterior projection requirements.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

However, in order to clearly demonstrate that crash related subjects (notably frontal impact and protective steering) are not compromise by the fitment of a Frontal Protection System, it may well be necessary for the Frontal Protection System manufacturer to conduct a full vehicle crash tests. Typical issues that need to be considered are:

- Structural effects on the front of the vehicle
- Airbag deployment trigger method and timing
- Seatbelt pre-tension trigger method and timing

The purpose of this paper is to seek the opinions of the other TAAM members in order to understand the intended scope of Annex I paragraph 2.1.9.

Possibilities of Solution

A	All directives listed for M1 vehicles in Framework Directive 2006/116/EC Annex IV need to be considered, and full tests need to be conducted (including vehicle crash tests) where applicable to demonstrate conformity.
B	Frontal Protection System STU manufacturers should demonstrate by some means that the fitment of their product still ensures conformity with other type approval directives but they are not expected to conduct crash tests.
C	Any other interpretation/guidelines agreed at the TAAM

Comments:

At a table round question about the opinion of the participants showed the differences in the interpretation.[...] said that it was likely that the intention was not to make crash tests compulsory, but he would look into the matter and come back to TAAM with answer.

6.23 Frontal Protection Systems, Interpretation of Annex 1, Par. 2.1.9, N1, 2005/66/EC N1 Vehicles

In the case of M1 vehicles the range of subjects to be considered is common for all Member States.

However, in the case of N1 vehicles the whole vehicle requirements vary from country to country. How should the Type Approval Authority issuing an approval for a Frontal Protection System ensure compliance with Annex I paragraph 2.1.9 when it is not clear which subjects need to be considered?

Possibilities of Solution

A	Only those approvals actually held by the base vehicle need be considered
B	All directives listed for N1 vehicles in Framework Directive 2006/116/EC Annex IV need to be considered for the Frontal protection System, regardless as to whether the base vehicle has approval to them or not
C	Any other interpretation/guidelines agreed at the TAAM

Decision: "B"

6.24 Emissions, OBD Interface Tools, 2005/61/EC

2006/51/EC HEAVY DUTY DIESEL EMISSIONS:

OBD INTERFACE TOOLS

BACKGROUND

The OBD requirements for Heavy Duty Diesel Emissions specify requirements concerning the storage time for non-erasable fault codes. They also specify the standard for diagnostic and interface tools.

LEGISLATION

Annex IV

3.9.2. From 9 November 2006 for new type approvals and from 1 October 2007 for all registrations, in the case of a non-erasable fault code being generated according to sections 6.5.3 or 6.5.4 of Annex I to Directive 2005/55/EC, the OBD system shall retain a record of the fault code and the hours run by the engine during the MI activation for at least 400 days or 9 600 hours of engine operation.

Any such fault code and the corresponding hours run by the engine during MI activation shall not be erased through use of any external diagnostic or other tool as referred to in section 6.8.3 of this Annex.

6.8.3. Test equipment and diagnostic tools needed to communicate with OBD systems must meet or exceed the functional specification given in ISO 15031-4 or SAE J1939-73 section 5.2.2.1.

TAAM DISCUSSION

It seems that some manufacturers have interpreted the above words to mean that fault codes can be erased provided the equipment used can be considered to be outside the scope of the legislation.

[...] would like to seek the opinion of the other TAAM members.

Possibilities of Solution

A	Tools that do not comply with the functional specification given in ISO 15031-4 or SAE J1939-73 section 5.2.2.1. <u>are not allowed to read diagnostic data or communicate with the OBD system</u>
B	Tools that do not comply with the functional specification given in ISO 15031-4 or SAE J1939-73 section 5.2.2.1. <u>are allowed to read diagnostic data but they must not be able to communicate with the OBD system to erase fault codes etc.</u>
C	The <u>legislative requirements</u> concerning erasable fault codes (Annex IV paragraph) <u>only apply to tools that comply</u> with the functional specification given in ISO 15031-4 or SAE J1939-73 section 5.2.2.1. <u>Other proprietary tools are outside the scope of the legislation and, hence, can be allowed to erase fault code data.</u>

Solution:

[...] proposed the following solution and there **were no objections**:

OBD system may only be accessed by test equipment and diagnostic tools that must meet or exceed the functional specification given in ISO 15031-4 or SAE J1939-73 section 5.2.2.1. Moreover, they should never erase fault codes and fault codes must not be erasable.

6.25 Directive 2005/55/EC (HDV emissions)

[...] has granted type approvals to HDV vehicles fitted with engines meeting limits of row B2 (EURO 5) and the requirements set in the technical annexes of Directive 2005/55/EC.

These vehicles are not equipped with NOx control systems.

As known prescriptions concerning NOx control systems have been introduced at a later stage by Directive 2005/78/EC and 2006/51/EC.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Options:

A) The above vehicles need to be re-homologate in accordance to Directives 2005/78/EC and 2006/51/EC in order to be registered after 1st October 2007

B) The above vehicles can be registered after 1st October 2007 without extending type approval.

[...] thinks that option A is the right one namely the relevant approvals granted according to Directive 2005/55/EC need to be extended in order to cover the requirements introduced by Directives 2005/78/EC and 2006/51/EC.

Comments:

Proposed solution "A"

[...] suggested that because the question arrived late all Member States should have the opportunity to consider and comment on it when they have received the draft minutes.

7 Items relating to Framework Directive 92/61/EEC and 2002/24/EC (motor cycles)

7.1 Numbering of vehicle type-approvals, 2002/24/EC

Issue

Directive 2002/24/EC European Type-Approval of 2 or 3-wheeled vehicles

Prescription

This Directive states on its Annex V the way of numbering the type-approval certificates.

NUMBERING AND PARKING

A. TYPE-APPROVAL CERTIFICATE NUMBERING SYSTEM (Article 5(3))

1. The type-approval number shall consist of:

- . four sections for vehicle type-approvals and
- . five sections for system, component, and separate technical unit approvals, as detailed below.

In all cases, the sections shall be separated by the .* character.

Section 1: the lower case letter.e. followed by the distinguishing code (number) of the Member State issuing the type-approval: 1 for Germany; 2 for France; 3 for Italy; 4 for the Netherlands;

5 for Sweden; 6 for Belgium; 9 for Spain; 11 for the United Kingdom; 12 for Austria; 13 for Luxembourg; 17 for Finland; 18 for Denmark; 21 for Portugal; 23 for Greece; 24 for Ireland.

Section 2: the number of the base Directive.

Section 3: the number of the latest amending Directive applicable to the type-approval.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

In the case of vehicle type-approvals, this means the latest Directive amending an Article (or Articles) of this Directive.

In the case of system, component and separate technical unit type-approvals, this means the latest separate Directive containing the actual provisions with which the system, component or technical unit conforms.

However, if a base directive has not been amended, its number is retaken in Section 3.

Should a Directive contain different implementation dates referring to different technical standards, an alphabetical character shall be added to specify to which standard the approval was granted.

Where system, component or separate technical unit type-approvals are possible according to chapters or sections of the same separate directive, the number of the separate directive shall be followed by the number of the Chapter 1 (1), Annex (2) and Appendix (3) in order to indicate the subject of the type-approval. In all cases, these numbers shall be separated by the ./ character.

(1): In Arabic characters

(2): In Roman characters

(3): In Arabic characters and capital letters, where applicable.

Section 4: a four-digit sequential number (with leading zeros as applicable) to denote the base type-approval number. The sequence shall start from 0001 for each base Directive.

Section 5: a two-digit sequential number (with leading zeros if applicable) to denote the extension.

The sequence shall start from 00 for each base type-approval number.

2. In the case of EC type-approval for a whole vehicle, Section 2 shall be omitted.

3. On the vehicle's statutory plate only, Section 5 shall be omitted.

4.

In the case of vehicle type-approvals, we have to follow for the numbering on the certificates point 1 (sections 1, 3, 4 and 5) and point 2.

Question:

Last modification of Directive 2002/24/EC has been an updating of Annex II (Information document) by Directive 2005/30/EC, but none of their articles has been modified as stated on point 1, section 3, paragraph 2 (underlined). How is then written the numbering of a vehicle type-approval?

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Possibilities of solution

Comments

A	ex* <u>2005/30</u> *6789*00	
B	ex* <u>2002/24</u> *6789*00	

*/The numbering of a vehicle type approval should reflect the original directive and not the amendment of the directive. Example: for Directive 2002/24/EC, annex II of which was amended by Directive 2005/30/EC, the numbering should remain e9*2002/24*6789*01./*

Additional Question :

Further on, is possible to extend a Directive 92/61/EEC by changing the numbering to a 2002/24/EC which repealed the first one?

Example:

Base Directive of a vehicle type-approval: e9*92/61*6789*00

Extension of the same vehicle type: e9*2002/24*6789*01

Decision: NO

7.2 Signature on COCs, 2002/24/EC

Article 5 of Directive 2002/24/EC reads:

1. The competent authority in a Member State shall complete the type-approval form contained in Annex III for all types of vehicles in respect of which it conducts type-approval, and in addition shall enter the test results under the relevant headings on the form attached to the vehicle approval form, the model for which is given in Annex VII.

One of the attachments to this type approval form is:

“Name(s) and specimen(s) of the signature of the persons authorised to sign the certificates of conformity and a statement of their position in the company.”

Are the COC's with the wrong signature valid or not?

Decision, comments:

COCs with a signature that is different from the signature in the Type Approval file are not valid. In such cases, registration is not possible. All TAAs should be informed via ETAES. It is noted that some TAAs will not be able to verify whether the signature is correct or not.

In the case that the CoC is signed by local representative of the manufacturer than it is valid only in that country where it was issued.

7.3 Persons authorised to sign the COC's, 2002/24/EC

Directive 2002/24/EC, persons authorised to sign the COC's and their position in the company

Article 7 of Directive 2002/24/EC reads:

„1. A certificate of conformity, a model of which is shown in Annex IV-A, shall be completed by the manufacturer for each vehicle produced in conformity with the type that has been approved. Such a certificate shall accompany each vehicle. However, Member States may request, after giving at least three months' notice to the Commission and other Member States, for reasons of vehicle taxation or in order to draw up the vehicle registration document, that the certificate of conformity shall contain details other than those mentioned in Annex IV-A, provided that those details are explicitly included in the information document.

The certificate of conformity shall be made in such a way as to prevent any forgery. For this purpose, the printing shall be made on paper protected either by coloured graphics or watermarked with the vehicle manufacturer's identification mark.

2. [...]”

One of the attachments to the type approval form in Annex III is:

“Name(s) and specimen(s) of the signature of the persons authorised to sign the certificates of conformity and a statement of their position in the company.”

Question:

Is it possible that a persons outside the organisation and in the following outside of the Conformity of Production System of the manufacturer (e.g. several dealers in different member states for a manufacturer in China) may sign COC's?

Possibilities of solution

Comments

A	Due to the wording of Directive 2002/24/EC, Annex III these persons must be inside the manufacturers company.	
B	These persons may be anyone	
C	These persons may be anyone, but must be inside the Conformity of Production system of the manufacturer.	

Comments:

Only persons that are inside the manufacturer's Conformity of Production system may sign COCs.

In some countries the importers are authorised by the manufacturer to sign the CoC / [...]. That should be stopped.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Additional question from [...] who referred to the following section of article 7 asked whether it was enough for manufacturers who protect documents using coloured graphics to just print manufacturer's name and logo.

Decision:

In accordance with article 7 of Directive 2002/24/EC, any coloured graphics shall be considered an acceptable means of protecting the CoC against forgery.

7.4 EC type approval number and date in COC's, 2002/24/EC (also Dir. 70/156/EEC and 2003/37/EC)

70/156/EEC, 2002/24/EC, 2003/37/EC: EC type approval number and date in COC's

Due to the model COC in the annexes of the type-approval-directives the EC type-approval number and the date has to be entered into the COC.

If there are several extensions of an EC type-approval it is nearly impossible to check the conformity of a used vehicle (or new vehicle) or find the correct data for registration purposes, if there is no information in which extension of the type approval a specific vehicle is described.

Question:

What is the correct EC type-approval number and date?

Possibilities of solution

Comments

A	Base type-approval number and corresponding date (Extension number *00).	If there are technical changes from one extension to another it is impossible to check the conformity of the vehicle.
B	Anyone of the extension-numbers and corresponding date.	If there are technical changes from one extension to another it is impossible to check the conformity of the vehicle.
C	EC type-approval number and corresponding date of the last valid extension where the vehicle is described in the documentation file attached to the EC type-approval certificate.	The vehicle and the data in the COC has to correspond to the extension mentioned on the COC.

Decision:

The correct EC type approval number and date is the EC type approval number and corresponding date of the last valid extension where the vehicle is described in the documentation file attached to the EC type approval certificate.

7.5 Modifying of VIN, 93/34/EEC

Issue

Directive 93/34/EEC

Prescription

3.VEHICLE IDENTIFICACION NUMBER

The vehicle identification number consists of a structured combination of characters assigned to each vehicle **by their manufacturer**. Its purpose is to enable any vehicle to be identified **unambiguously** via its manufacturer - without any need for any other information - for a period of 30 years. The identification must meet the following requirements:

3.1. the vehicle identification number must be entered on the manufacturer's data plate. It must also be hammered or punched in such a way as **to avoid obliteration** or change on the chassis or frame at a point such that it can easily be accessible, and it must be situated on the right half of the vehicle

Question:

Can a second manufacturer modify, erase or hid the original V.I.N. or add a new V.I.N.

Possibilities of solution

Comments

A	Only the original manufacturer can modify the VIN before the vehicle leave from assembly plant	
B	It's possible the V.I.N. obliteration or the addition of a second V.I.N. by a second stage manufacturer	

Decision:

Only the original manufacturer can modify the VIN before the vehicle leaves the assembly plant. All modifications must be recorded in the COC under 'Remarks'. After registration, only authorised organisations are permitted to modify the VIN.

7.6 Installation of lighting and light-signalling devices, 97/24/EEC

Issue

Directive 93/92/EEC*2000/73/EC installation of lighting and light-signalling devices.

Prescription

In the Annex II, III, IV, V, VI, the point 5 of this Directive is written the permission of the installation the lighting and the light-signalling devices from the M1 and N1 category vehicle. So in this case, is possible to install and approved a gas discharge light for a dipped-beam lamp?

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

The problem with this dipped-beam lamp is about the headlamp-levelling test. In the 93/92/EEC and 2000/73/EC Directive is not written about this test and also this Directive has no mentioned about the mandatory to install a headlamp cleaners.

Is it possible to approve this dipped-beam lamp without the prescriptions of the 97/28/EC requirements?

Possibilities of solution

Comments

A	The gas discharge light for a dipped-beam lamp is possible to approve by a vehicle with two wheels.	
B	The gas discharge light for a dipped-beam lamp is possible to approve by a vehicle with two wheels, but with the requirements installation on the M1 and N1 vehicles (levelling and cleaning headlamp test)	
C	It is not possible because the Directive 93/92/EEC*2000/73/EC not consider this dipped-beam lamp to be install in a vehicle with two wheel.	

Comments:

A detailed presentation was made by [...] about their experience with the use and approval of gas discharged lamps on motorcycles. The background of that study was that a manufacturer applied for approval for motorbike equipped with gas discharged lamp. After extensive tests had been conducted to the satisfaction of [...] and they approved the lamps.

***After long negotiation no final decision was made.** It became clear that in the moment there are requirements for such lamps only for classes M and N, on the other side it is not forbidden to issue an approval.*

All the countries agreed that the legislation has to be harmonised. A high level of technical expertise and additional tests shall be executed during approval. Approval may be only possible for the vehicle manufacturer, who is able to control the whole vehicle under CoP and evolution not for aftermarket products..

7.7 External projections, 97/24/EC Chapter 3

Issue

Directive 97/24/EC Chapter 3 on external projections

Prescription

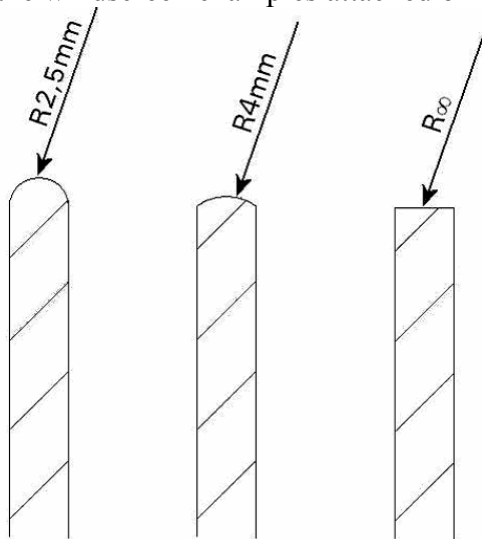
This Directive defines some specific requirements for windscreens fitted on unbodied 2 or 3 wheeled vehicles:

6.1. The upper edge of the windscreen of fairing shall have a radius of curvature of at least 2 mm or else be covered with an-edge protection material in accordance with item 3.3.

3.3. All external projections covered by this annex which are made of or covered with soft rubber or plastic having a hardness of less than 60 Shore A are considered to meet the requirements set out in items 5 and 6.

Question:

Do the windscreen examples attached on next page need a soft cover?



Windscreen 1 Windscreen 2 Windscreen 3

Possibilities of solution

Comments

A	Only windscreen 1 is deemed to fulfil with point 6.1 without fitting a soft cover	
B	Only windscreens 1 and 2 are deemed to fulfil with point 6.1 without fitting a soft cover	
C	All windscreens are deemed to fulfil with point 6.1 without fitting a soft cover	

Decision: “A”

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

7.8 Replacement exhaust test requirements, 97/24/EEC (2005/30/EC)

Directive	: 2005/30/EC
Subject	: Replacement exhaust test requirements.

Annex	: II, III and IV
Paragraph	: 3. Component type-approval non original part.
Point	: 3.5.5.

Text	<p>: <i>3.5.5. Evaluation of the emission of pollutants of vehicles equipped with replacement silencer system</i></p> <p><i>The vehicle referred to in section 3.2.3.3, equipped with a silencer of the type for which approval is requested, shall undergo a Type I and a Type II test under the conditions described in the corresponding Annex to Chapter 5 annexed to this Directive according to the type-approval of the vehicle.</i></p> <p><i>The requirements regarding emissions shall be deemed to be fulfilled if the results meet the limit values according to the type-approval of the vehicle.</i></p>
------	--

Question	: If catalytic converter is unaltered/untouched (E.g. separate from the replacement-silencer), is it necessary to perform the tests Type I and II according to Chapter 5?
-----------------	---

Solutions	A	Yes, even if it is obvious that there will no deterioration.	
	B	No, emission requirements can be deemed to be fulfilled.	
	C	Requirements must be reviewed	

Remarks	: <i>Even if a catalytic converter is unaltered/untouched (e.g. separate from the replacement silencer), it is always necessary to perform the tests Type I and II according to Chapter 5 even if it is obvious that there will be no deterioration.</i>
----------------	--

7.9 Replacement catalytic converters, 2005/30/EC

Issue

Directive 2005/30/EC on replacement catalytic converters

Prescription

This Directive entered into force on the 18th May 2006 modifying also annex II of Frame Directive 2002/24/EC adding points to describe the catalytic converter.

If there is an extension of a vehicle approved before this date, has the information document (Annex II) to be updated with the new points?

Possibilities of solution

Comments

A	Annex II must be updated with the new points of this Directive when applying for any extension	
B	Annex II must be updated only when the extension refers to changes on the engine and/or exhaust system	
C	Annex II is not updated when applying for an extension. It is applicable only for new types	

Comment:

If a vehicle extension was approved before Directive 2005/30/EC entered into force on the 18 May 2006, Annex II must be updated with the new points of this directive when applying for any extension.

7.10 Directive 2005/55/EC on replacement exhaust systems

Issue: Question on replacement exhaust for motorcycles Directive 2005/30/EC

The last TAAM has been held just some weeks ago but some more questions have already arisen to be commented.

I would like to ask for your interpretation on the day of entry into force of Directive 2005/30/EC regarding the replacement catalyst for motorcycles. For new approvals it is clear that the date is 18th May 2006, but I understand that there is not a date covering old approvals and it seems that all exhaust that are going to be sold in Europe from 18th May 2006 will have to fulfil this new Directive.

Nevertheless, there is a new Directive this year (2006/27/EC) that also modifies Directive 2005/30/EC and the day of entry into force is 1st July 2007.

Question: Could you please give me your interpretation on this new Directive?

[...] proposed that because no Member State had had time to consider the matter, a decision on this question should be postponed until the next TAAM. There were no objections.

Decision:

As no decision was reached, this issue will be raised at the next TAAM.

8 Items relating to Framework Directive 74/150/EEC and 2003/37/EC (agricultural and forestry tractors)

8.1 Agricultural tractors, Small series, time validity of type-approval certificate, 2003/37/EC

Issue:

Directive 2003/37/EC provides for approval of small series on the basis of exemptions from one or more of the provisions of one or more of the separate directives. On the basis of type-approval certificate a certain number of vehicles produced in small series shall be permitted to be registered per year in a Member State and this number shall not exceed the limits prescribed by the Directive.

Question:

Can we define time validity for type-approval certificate for small series and what is the acceptable time limit (one year or more)?

Possibilities of solution:

We consider that definition of time validity for type-approval certificate is permissible but this validity must be more than a year and the manufacturer must request each year for authorization of number of units within a type to be registered, placed on sale or put into service per year on the basis of the certificate.

	A	Support this interpretation	
	B	Other decision (please specify)	

Decision:

The TAAs may define a period of validity for type-approval certificates for small series, because it is a type-approval with national validity.

8.2 40 km/h limit for T1-T3 tractors, 2003/37/EC

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

BACKGROUND

Type approval for existing types of T1-T3 tractors will become mandatory from 1 July 2009. Under the provisions of the Framework Directive 2005/67/EC, T1, T2 and T3 Tractors must have a design speed of no more than 40 km/h.

This is specifically addressed by the Maximum Speed Directive 74/152/EC (which includes specific references to the maximum overall gearing). The provisions of 92/24/EC (road speed limiters) are also applicable.

However, [...] have been advised of some Industry concerns that, despite the Type Approval restrictions, it may still be possible to easily adapt T1-T3 Tractors to enable them to exceed the 40 km/h limit when in service.

[...] has no direct knowledge of this issue and hence the purpose of this paper is to see whether other TAAM members have actually experienced any problems of this nature and, if so, to seek their advice about possible solutions.

TAAM DISCUSSION

[...] would like to seek the advice from the TAAM regarding measures that could be taken to ensure that T1, T2 and T3 Tractors do not exceed 40 km/h in service.

Comments:

[...] had the opinion that the speed has to be limited by technical units because the tractors are more powerful as they were in the time when the Framework Directive was produced. There was no objection on this opinion.

LEGISLATION

2005/67/EC TRACTOR TYPE APPROVAL:

Article 23

Enforcement measures for the EC type-approval

1. As regards vehicles belonging to categories T1, T2 and T3, Member States shall apply this Directive to:

- (a) new types of vehicles from 1 July 2005;*
- (b) all new vehicles entered into service from 1 July 2009.*

Annex II : Chapter A

Definition Of Vehicle Categories And Vehicle Types

A. The vehicle categories are defined as follows:

1. Category T : Wheeled Tractors

- Category T1: wheeled tractors with a maximum design speed of not more than 40 km/h, with the closest axle to the driver (1) having a minimum track width of not less than 1 150 mm, with an unladen mass, in running order, of more than 600 kg, and with a ground clearance of not more than 1 000 mm.

- Category T2: wheeled tractors with a maximum design speed of not more than 40 km/h, with a minimum track width of less than 1 150 mm, with an unladen mass, in running order, of more than 600 kg and with a ground clearance of not more than 600 mm. However, where the height of the centre of gravity of the tractor (2) (measured in relation to the ground) divided by the average minimum track for each axle exceeds 0,90, the maximum design speed is restricted to 30 km/h.

- Category T3: wheeled tractors with a maximum design speed of not more than 40 km/h, and with an unladen mass, in running order, of not more than 600 kg.

- Category T4: special purpose wheeled tractors with a maximum design speed of not more than 40 km/h (as defined in Appendix 1).

- Category T5: wheeled tractors with a maximum design speed of more than 40 km/h.

74/152/EEC MAXIMUM SPEED

Annex, paragraph 1

Preamble

Having regard to Council Directive 74/152/EEC of 4 March 1974 on the approximation of the laws of the Member States relating to the maximum design speed and load platforms of wheeled agricultural forestry tractors⁽³⁾, as last amended by Directive 97/54/EC, and in particular Article 5 thereof,

*Whereas, in view of the increase in maximum design speed to 40 km/h and of developments in the state of the art, it is now appropriate to adapt the requirement concerning the tolerance in speed measurement referred to in point 1.5 of the Annex to Directive 74/152/EEC;
Whereas the measures provided for in this Directive are in accordance with the opinion of the Committee on adaptation to technical progress introduced by Directive 74/150/EEC*

ANNEX

1. MAXIMUM DESIGN SPEED

1.1. For the type-approval tests, the average speed shall be measured on a straight track, which the tractor shall traverse in both directions from a flying start. The soil of the track shall be stabilized; the track shall be flat and at least 100 metres long; however it may include slopes of not more than 1.5%.

1.2. During the tests, the tractor shall be unladen and in running order without ballast weights or special equipment and the tyre pressures shall be those specified for road use.

*1.3. During the test the tractor shall be fitted with new pneumatic tyres having the **greatest rolling radius intended by the manufacturer for the tractor.***

1.4. The gear ratio used during the test shall be that producing the maximum vehicle speed and the throttle shall be fully open.

1.5. To take account of various unavoidable errors due, in particular, to the measuring technique and the increase in running speed of the engine with a partial load, a result 10% higher than the 40 km/h value shall be acceptable for the type-approval test. that the measured speed will exceed the value for the maximum design speed by 5%.

*1.6 **So that the authorities competent for the type-approval of tractors may calculate their maximum theoretical speed, the manufacturer shall specify as a guide the gear ratio, the actual forward movement of the powered wheels corresponding to one complete revolution, and the rpm at maximum power output with the throttle fully open and the speed governor, if fitted, adjusted as laid down by the manufacturer.***

9 **Miscellaneous**

9.1 **Short report of the ETAES-Meeting**

[...] reported that a memo of understanding for all ETAES members will be prepared at the end of the pilot project. It will be circulated with all the relevant agreements to all ETAES members to be signed by the relevant authorities to ensure that there is a sound basis for future development. 23 countries are participating in ETAES and M1, L and T approvals are currently being circulated. When the framework approvals permit it, other vehicles will be included on the server as well. The intention is to create a kind of board of management comprising some ETAES members. The task of this board will be to identify the next steps that must be taken to ensure the future of ETAES. At the moment, the ETAES server is situated at the KBA (Germany). The performance and capacity of the system could be improved in early 2007. A fee may have to be paid for using ETAES. The group is currently examining a variety of solutions (fees, contracts etc.). The KBA will conduct a rough cost analysis. It is estimated at the moment that it would cost between € 50,000 and € 60,000 per annum. Two options are being examined at present: firstly, the charging of a flat fee (ca. € 2,000 per TAA per annum) and secondly, the investigation of the possibility of getting start-up money from the Commission (DG INFSOC). Until a new solution is found, the ETAES server will continue to run on the KBA server. A subgroup headed by France, Iceland, and Norway is working on adding XML files for the server. These files contain structured data which is readable on every programme and could contain, for example, COC data. In this regard there are a large number of questions that have yet to be clarified at the next ETAES meeting.

9.2 **Short report of the Pocket bike sub-group**

The [...] reported that the purpose of the last meeting had been to respond to a request from the Commission to provide some input. The [...] whether there had been any developments in this regard.

[...] said that the paper drafted and submitted to the Commission by the TAAM Pocket Bike Subgroup would be discussed at the Commission in the near future.

The [...] stressed that TAAM's subgroup is not trying to compete with the Motorcycle Working Group and had merely been a response to a request from the Commission for an overview of the TAAs' opinions.

The *Commission* acknowledged this fact.

9.3 **Long timber transports on pole dolly**

SUBJECT: Log hauling combination. Are they allowed in your country?

Background:

Log hauling vehicle combination that has no traditional coupling device. The cargo (logs) acts as a coupling.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Concerns:

- coupling security (94/20/EC or R. 55),
- high-speed / tight cornering stability on uneven (esp. rutted) road pavements (70/311/EEC or R. 79),
- lack of rear and lateral protection devices (77/221/EEC, 89/297/EEC or R. 58, R. 73),
- insufficient lateral lighting and light-signalling devices (76/756/EEC or R. 48).



Question:

[...] would appreciate the other countries assistance / opinion concerning national approval, categorisation (are they regarded as trailers, vehicle combination components or anything else?) and registration restrictions (as speed limits, road category restrictions, etc.) of the above mentioned vehicles.

Comments:

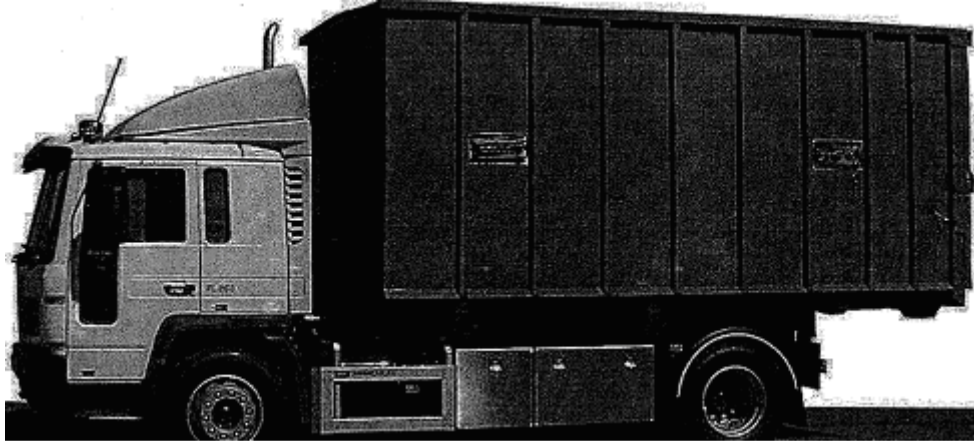
In some countries the use of such type of transportation are allowed controlled by special rules for the use.

Two Member States promised to supply [...] with their national regulation.

9.4 Transportation of Containers

QUESTION / PROBLEM / CONCERN:

Can a vehicle be allowed to have a “load” that protrudes over the rear of the vehicle, as on the hook-loader truck transporting a container, in the example below? Is the container in such case considered to be load or a part of the vehicle?



A	The container is considered as load and does not need to be equipped with an underrun protective device considering this load	
B	The container is considered as a part of the vehicle and must be equipped with an underrun protective device considering the protruding part	

Comments:

No agreement on this question.

In some Member States it is considered as a load in others it is considered as a part of the vehicle. The main question remained on the desk about the underrun protection. In some countries if the load protrudes more than 1 m than underrun protective device is required.

9.5 Questions relating to ECE-Regulations

Austria proposed that in future, questions relating to ECE regulations should be restricted to those relating to whole vehicle type approval.

[...] asked whether this meant that questions relating to Annex 4 were acceptable.

Austria confirmed that it did.

9.6 ECE-R21, Annex 8 Provisions in relation to gear lever

BACKGROUND

Section 5.1 specifies minimum radii and maximum protrusion requirements for switches, knobs and controls located in the potential head contact areas of the dashboard. It also identifies a head impact zone within which all contactable parts must not exceed head deceleration limits when subjected to the Annex 4 impact test.

In addition, Annex 8 takes account of the fact that airbags are now common features on many new cars and specifies a test procedure which can be used to show whether or not a dummy will contact the dashboard when the airbag is deployed. If an area of the dashboard cannot be contacted during the Annex 8 test then that section of the dashboard is exempt from the provisions of Paragraphs 5.1.2 to 5.1.6.

Section 5.3 then specifies requirements for other parts within the vehicle interior and this includes specific minimum cross sectional area and surface radius requirements for gear levers.

ISSUE

It was agreed at a previous TAAM that, if a gear lever is located within the head impact zone identified in Section 5.1, it must, in addition to the cross sectional area and radius requirements of Section 5.3, also be subject to paragraph 5.1.2 (and hence must comply with the Annex 4 head impact test requirements).

With the provisions of Annex 8 now added to the legislation, it seems clear that if a gear lever is mounted within the head impact zone, but cannot be contacted during the Annex 8 test, it should not need to be subjected to the Annex 4 impact test.

However, the key question is should this gear lever also be exempt from the cross sectional area and radius requirements of Section 5.3?

The problem is that, when referring to the Annex 8 tests, the legislation only mentions exemptions for the provisions of paragraphs 5.1.2 to 5.1.6 and it does not mention exemption from any of the Section 5.3 requirements.

LEGISLATION

ECE R21.1 (inc Supplement 3)

Definitions

2.3. “reference zone” is the head impact zone as defined in annex 1 to this Regulation, or at the choice of the manufacturer, according to annex 8, excluding the following areas: (see annex 10, explanatory notes, paragraphs 2.3. and 2.3.1.)

2.3.1. *the area bounded by the forward horizontal projection of a circle circumscribing the outer limits of the steering control, increased by a peripheral band 127 mm in width; this area is bounded below by the horizontal plane tangential to the lower edge of the steering control when the latter is in the position for driving straight ahead; (see annex 10, explanatory notes, paragraphs 2.3. and 2.3.1.)*

2.3.2. *the part of the instrument panel comprised between the edge of the area specified in paragraph 2.3.1. above and the nearest inner side-wall of the vehicle; this part of the surface is bounded below by the horizontal plane tangential to the lower edge of the steering control; and (see annex 10, explanatory notes, paragraphs 2.3. and 2.3.1.)*

2.3.3. *the windscreen side pillars; (see annex 10, explanatory notes, paragraphs 2.3. and 2.3.1.)*

Section 5.1

5.1.2. *Vehicle parts within the reference zone with the exception of those which are not part of the instrument panel and which are placed at less than 10 cm from glazed surfaces **shall be energy-dissipating, as prescribed in Annex 4 to this Regulation.***

5.1.4. *Switches, pull-knobs and the like, made of rigid material which, measured in accordance with the method prescribed in annex 6, project from 3.2 mm to 9.5m from the panel shall have a cross sectional area of not less than 2 cm², measured 2.5 mm from the point projecting furthest and shall have rounded edges with a radius of curvature of not less than 2.5 mm.*

5.1.7.2. *If the protective system of the vehicle type is able to **prevent head contacts of the occupants defined in paragraph 1.2.1. of Annex 8 with the instrument panel** and therefore no reference zone can be determined, the **requirements of paragraphs 5.1.2. to 5.1.6. are not applicable to this vehicle type.***

Parts of the dashboard above the level of the instrument panel, if contactable by a 165 mm diameter sphere, shall be at least blunted.

Section 5.3

5.3.2.3. *the handbrake control, when in the released position, and **the gear lever,** when in any forward gear position, have, except when placed in the zones defined in paragraphs 2.3.1. and 2.3.2. and in the zones below the horizontal plane passing through the "H" point of the front seats, **a surface area of not less than 6.5 cm² measured at a cross-section normal to the longitudinal horizontal direction up to a distance of 6.5 mm from the part projecting furthest, the radius of curvature being not less than 3.2 mm.***

TAAM DISCUSSION

Possibilities of Solution

A	A gear lever is mounted within the head impact zone, <u>but which cannot be contacted during the Annex 8 test</u> , is exempt from the Annex 4 impact test but must still comply with the radius and cross sectional area requirements of 5.3.2.3
B	A gear lever is mounted within the head impact zone, <u>but which cannot be contacted during the Annex 8 test</u> , is exempt from the Annex 4 impact test and is also exempt from the radius and cross sectional area requirements of 5.3.2.3

Decision: “A”

A gear lever is mounted within the head impact zone, but which cannot be contacted during the Annex 8 test, is exempt from the Annex 4 impact test but must still comply with the radius and cross sectional area requirements of 5.3.2.3

9.7 ECE-R24, Diesel emission and smoke Part I-III

Issue

Part I of R 24 is dealing with the visible diesel smoke and the absorption coefficient. [...] and other TAA are using the corrected value in the approval document regarding the measurements of the diesel engine visible emissions applying Part I of the R 24. Due to the prescriptions made in the template of the approval doc [...] is using the corrected value although some prescriptions reflect more to the tested value.

If the majority of the TAA is of the opinion that the described value has to be the tested one not the corrected absorption coefficient than the values in the docs are of the wrong number.

Because of the today's practice in several TAA and the accredited Technical Services a common understanding of the delegates would be helpful. Until then [...] will carry on as practiced until now.

Prescription

Directive 2003/102/EC

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Possibilities of solution

Comments

1	A	The correct value in the approval doc is the corrected absorption coefficient. (Part I R24)	
	B	The correct value in the approval doc is the measured absorption coefficient.	

Decision: "A"

The correct value in the approval document is the corrected absorption coefficient. (Part I R24)

9.8 ECE-R30 + ECE-R54, Conformity procedures, substandard tyres

[...] wishes to draw the attention of TAAM to concerns regarding alleged malpractices existing within some parts of the tyre industry, and questions concerning the enforcement of production conformity procedures by various Member State approval authorities.

These concerns were originally raised following press allegations that Continental Tyres were producing 'special' tyres for consumer tests using a production facility separate from the normal series production facility. Continental have denied using such a facility, however there have been separate allegations that other tyre companies are taking similar measures to produce 'special' tyres for production conformity checks. The allegations largely concern tyre companies operating in some new Member States, and companies operating in countries that have signed up to the 1958 UNECE Agreement and are obtaining approvals to UNECE Regulations 30 and 54.

It has been suggested that there is an absence of systematic control of the way that some States and technical laboratories are implementing the homologation tests. It is also suggested that the use of ISO audits to confirm production capability is often applied inconsistently; in many cases the ISO audits are performed on a generic basis, with very little attention applied to the specific characteristics of tyre production.

[...] has no evidence to suggest that there are substandard tyres on the market that have been approved to the tyre Directive or equivalent UNECE Regulations. However, due to the safety-critical nature of this component we need to take such allegations seriously.

We believe that TAAM can have a role in addressing these concerns, and in particular we would ask the group to:

- identify concerns relating to specific products, or specific approval sources
- to consider tyres as a priority item (where members have budgets to purchase products for audit purposes),

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

- to co-ordinate the above activities, ensuring that they are targeted at products or sources that have been identified as causing concern.

If evidence is found of widespread non-conformity to the established standards, we will support Member States in taking appropriate action against the companies concerned. We will also consider if any regulatory changes are necessary to improve consistency of production conformity procedures.

Decision:

[...] asked the TAAs to inform the Commission immediately if it ever became aware of a tyre manufacturer producing tyres especially for production conformity checks.

9.9 ECE-R48, Change of light bulbs

76/756/EEC relating to the installation of lighting and light-signalling devices on motor vehicles and UN/ECE Regulation 48 (paragraph 2.7.1.1.1.) require that replaceable light sources have to be designed in a way that they can be inserted in and removed from the holder of its device without tools.

This provision is meant to ensure that it is not anymore necessary to loosen a front bumper or execute other technical operations before a broken headlamp bulb can be changed. In other words, every user of a motor vehicle should be able to change a broken light bulb himself within a decent time frame.

[...] is in the process of evaluating if the above mentioned provision has indeed lead to a substantial improvement of the situation or if, for certain vehicle types, the light bulb change can still only be done by a specialised repair shop.

What is the opinion of the type-approval authorities? Are further amendment / clarifications to the respective technical requirements necessary?

Conclusion:

The Member States pointed out the poor wording of the regulation: if the manufacturer states in the manual, that some parts has to be removed in order to change the bulbs it has to be accepted by the TAAs.

The Commission invited TAAs to send proposals for the improved wording of the text to the Commission.

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

9.10 ECR-108, Run flat tyres

QUESTION / PROBLEM /CONCERN:

Is it possible, according to ECE Regulation R108, to include run flat tyres in a type approval for a retreading unit? [...] opinion is that the regulation R108 does not cover this type of tyres. We would appreciate the opinions of the other member states.

A	Run flat tyres can be included in an R108 type approval for a retreading unit	
B	Run flat tyres can not be included in an R108 type approval for a retreading unit	

Comments:

No final decision on this matter.

The Member States concluded that the regulation should be reworded to ensure clarification.

9.11 ECE-R117, Tyre road noise, category of use ‘special’

Directive	: ECE Regulation R117 in relation with R30 and R54
Subject	: Tyre road noise, category of use “special”

Annex	: --
Paragraph	: 2. Definitions
Point	: - R117 point 2.8 & 2.9 - R30 point 2.1.3 - R54 point 2.2
Text	<p><i>ECE R117</i></p> <p>2.4. <i>"Tyre Class" means one of the following groupings:</i></p> <p>2.4.1. <i>Class C1 tyres: Tyres conforming to ECE Regulation No. 30.</i></p> <p>2.4.2. <i>Class C2 tyres: Tyres conforming to ECE Regulation No. 54 and identified by a load capacity index in single formation lower or equal to 121 and a speed category symbol higher or equal to "N".</i></p> <p>2.4.3. <i>Class C3 tyres: Tyres conforming to ECE Regulation No. 54 and identified by:</i> <i>(a) a load capacity index in single formation higher or equal to 122, or</i> <i>(b) a load capacity index in single formation lower or equal to 121 and a speed category symbol lower or equal to "M".</i></p> <p>2.8. <i>"Normal tyre" means a tyre intended for normal, everyday, on-road use;</i></p>

TYPE APPROVAL AUTHORITIES MEETING
28-29. 09. 2006. - VIENNA, AUSTRIA

Text :

2.9. *"Special use tyre" means a tyre intended for mixed use both on- and off-road or for other special duty.*

2.10. *"Snow tyre" means a tyre whose tread pattern, tread compound or structure are primarily designed to achieve in snow conditions a performance better than that of a normal tyre with regard to its ability to initiate or maintain vehicle motion.*

ECE R30
2.1.3. *Category of use (ordinary (road-type) or snow tyre or for temporary use);*

ECE R54
2.2. *Category of use:*
2.2.1. *"Normal tyre" means a tyre intended for normal, everyday, on-road use;*
2.2.2. *"Special use tyre" means a tyre intended for mixed use both on- and off-road or for other special duty.*
2.2.3. *"Snow tyre" means a tyre whose tread pattern, tread compound or structure are primarily designed to achieve in snow conditions a performance better than that of a normal tyre with regard to its ability to initiate or maintain vehicle motion.*

Note:
most likely the text of R117 is a copy of 92/23/EC, where this problem does not occur. The category of use is not mentioned in the general approval document, only in the noise type-approval.

Question : Regulation 117 offers the possibility of approving a "special" tyre for category C1, however Regulation 30 does not give the possibility for such an approval. The reason for application of such an approval is the possibility to allow a noise level of +2 dB(A) for such a special tyre, where a "snow" tyre is only allowed +1 dB(A) for noise.

Is it still possible to approve an already for R30 approved tyre, category of use "normal" or "snow", as "special" for R117?

Solutions	A	It is not possible to approve a tyre for R117 that has an R30 approval.	The tyre type is different than defined.
	B	The Regulations need to be synchronised.	Request GRRF.
	C	Regulation 30 does have to be considered.	Approval can be granted for a "special" tyre category C1.

Decision : "B"
The regulations has to be synchronised was the opinion of the Member States.

10 Next meeting (Q2 2007) – Location to be established

[...] asked the host countries to make sure when they set the dates for the TAAM that there were no meetings in Geneva at the same time.

It was agreed that all papers should be submitted to the host country at least two weeks before the meeting.

On behalf of all the delegates, the *Netherlands* thanked Austria for its excellent organisation and hospitality.

Decisions:

- **The following meeting locations were established:**
Spring 2007: Netherlands
Autumn 2007: Estonia
Spring 2008: Germany
Autumn 2008: UK
- **The cut-off date for the submission of papers is two weeks (at the latest) before a meeting.**