



The Eurocouncil of the Fédération Internationale de l'Automobile
European Bureau

Response of the Fédération Internationale de l'Automobile (FIA) to the Public consultation on outline proposals for a Regulation of the European Parliament and of the Council on Advanced Safety Features and Tyres

The Eurocouncil of the Fédération Internationale de l'Automobile (FIA) represents through its affiliated members, national motoring and touring organisations in Europe, more than 34 million motorists in the European Union. Europe's motoring and touring organisations have as one of their highest priorities the improvement of road safety and the environment. In this respect they carry out vehicle and safety equipment consumer tests, offer driver training, run seat belt campaigns and assess the safety of mobility infrastructure. Europe's motoring organisations are partners in a number of safety assessment programmes like the European New Car Assessment Programme, Euro NCAP, the New Programme for the Assessment of Child restraint Systems NPACS, the European Road Assessment Programme EuroRAP, EuroTest and the European Tunnel Assessment Programme EuroTAP.

With regard to the 42000 road users who die each year on European roads and the objective of the European Union to reduce this number to 25000 by 2010, the FIA is of the opinion that all possible measures have to be investigated. In case feasibility and cost/effectiveness proof to be positive these measures should be implemented.

The FIA is the leading body in the eSafetyAware project which currently is supporting the fast implementation of ESC on (motor) vehicles.

The FIA welcomes the initiative of the Commission to update and simplify the Type Approval legislation on a variety of safety- and environmentally- related components in order to reduce the number of road casualties, the CO₂ emission of road transport and traffic noise pollution.

The proposed regulatory approach will definitely lead to much quicker approvals and therefore to the possibility of quicker implementation of new safety features and improved environmental technologies. In this respect the increasing cross reference to UNECE regulations is a positive development.

ESC

The FIA believes that ESC must to be implemented on all motor vehicles (category M, N and O >3.5 tonnes GVW), as soon as possible. The FIA is pleased to note manufacturers who fit their cars with ESC on a voluntary basis especially on those in the cheaper market segments.

The FIA has proposed to set up a voluntary agreement between the Commission and industry within a year to fit new types of the above -mentioned (motor) vehicle



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categories with ESC as from 2012 with the caveat that if such an agreement is not forthcoming within a year or seen not to be effective a legislative solution would be needed.

Questions

Do you support the mandatory installation of ESC for all categories of M and N class vehicles (plus trailers over 3.5 tonnes)? Should any exemptions be allowed?

Yes, we do, initially via a voluntary agreement between the Commission and the industry. Exemptions might be allowed for special vehicles.

Is 2011 a reasonable target for a requirement for new car models to be fitted with ESC?

The World Forum for the Harmonization of Vehicle Regulations (WP 29) is doing its utmost on having a draft GTR (Global Technical Regulation) on ESC for 2008. The requirements have to be implemented in ECE Regulation 13 H (Brakes). Therefore the FIA is of the opinion that 2011 will be a reasonable target for requiring ESC on new car models (MY 2012).

What would be a reasonable time scale for the mandatory introduction of systems such as automatic emergency braking and lane departure warning (assuming a favourable cost-benefit case can be made)?

Further development and clear proof of the good performance of these systems is needed. If this further proof results in positive results of studies and validation of test methods as well as of cost-benefit calculations, the FIA is of the opinion that these systems should be introduced as soon as possible.

Tyres

The features of tyres for (motor) vehicles is a compromise between a complex set of requirements on safety, comfort and environment as well as of driving circumstances like dry, wet, mud, snow and ice.

The FIA club ADAC has more than 30 years of experience in tyre testing for the European automobile clubs.

LRRT

The FIA welcomes LRRT whilst emphasizing that these tyres should not have any negative effects on safety. In addition the FIA underlines the Commissions proposal for technical/performance requirements for tyres in four areas (rolling sound, rolling resistance, TPMS and wet grip). In particular the new wet-grip requirements might be copied from UNECE Regulation 117 (tyre rolling sound emission).



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The FIA urges that consumers are informed on the full nature of both rolling resistance and wet grip. There is a trade-off between these features and the FIA would find it regrettable when tyres, besides other markings, will be fitted with separate markings on rolling resistance.

The FIA Club ADAC will send also a reaction on this Consultation. The FIA asks that special attention is paid to the ADAC statements on the ISO 10844 measuring method for the rolling sound of tires.

Exemptions might be possible for “special use” tyres.

TPMS

Currently there are both direct- and indirect measuring systems. The former is the more expensive system, it measures the inflation pressure and the temperature of each tyre. Individual pressure loss as well as steady pressure drop in all tyres can be detected. The latter recognises differences in wheel revolutions caused by pressure drops, it is not possible to detect steady pressure drop in all tires.

Because of diffusion tyres loose approximately till 0.1 bar pressure per month

Both systems may increase safety by warning drivers for possible tyre damage. Less inflation pressure will cause higher rolling resistance and as a consequence higher fuel consumption.

Initially the FIA is in favour of implementing indirect TPMS due to safety concerns and because of the minor extra costs. Research into relatively cheaper TPMS that also can detect steady pressure drops in all tires should continue. These systems must be implemented at a later stage.

The FIA remains at your disposal for any further discussion should you so wish.

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