

## **Proposal for amendments to CITA proposals ECE/TRANS/WP.29/GRVA/2025/18 and ...GRVA/2025/19 (as amended by GRVA-21-04), respectively amending UN R13 and R13H**

Proposed amendments to the regulation are indicated in bold for new characters, and strikethrough for deleted characters. The proposed changes by OICA and CLEPA to CITA proposal are [highlighted in blue](#).

### **I. Introduction**

Industry recognizes the need from those countries using brake pressures for the roller brake tester check at PTI, to maintain the same level of quality with Electrical Transmission Braking technology. However, as explained in the OICA paper [GRVA-21-52](#), the opening of OBD for braking system creates new safety and security risks which must be prevented.

Industry is ready for a compromise but would like to remind the following:

- The scope of the proposal to use OBD must remain limited to ETBS for the special purpose of reading (only reading) the brake demand values.
- PTI offboard tools shall never write anything in the vehicle electronics, nor control the braking system actuators (ECUs output), for the sake of preventing cyber-security breaches and potential safety risks (e.g. controlling service brake while the park brake is applied may damage the brakes).
- The use of reference braking forces is only one technical solution: a number of countries do not use reference braking forces, with equivalent safety level.
- The OBD requirements (as well as the display of the values) should be reconsidered the day new simpler solutions would be available (e.g. self-assessment of available deceleration).
- As a reminder of industry general position on PTI for checking electronic systems:
  - Checking an electronic system every one or two years at PTI is not sufficient for safety.
  - The monitoring of faults and the driver warning must be done in real time, on the vehicle.
  - PTI should rely on the same information as the driver: the warning signals.
  - PTI should focus on what electronic systems can hardly assess, e.g. tires wear, steering joints play, disc cracks...

### **II. Proposal for UN R13**

- 5.1.4.6.2.1. It shall be possible to evaluate the relationship between the brake demand value(s) and the measured braking force on a roller brake tester. The brake demand value(s) shall be displayed on the vehicle and easily readable from the driver's seat during the roller brake test (e.g., using a menu system, automatic demand, etc.). **Additionally As an alternative to displaying the values, it shall be possible to read ~~and record~~ the brake demand value(s) through a digital communication with the vehicle (e.g. the On-Board Diagnostics (OBD) connector using a scan tool).** The vehicle manufacturer shall describe how to display ~~and or~~ access those values and make this information available according to paragraph 5.1.4.5.1. above.

### **III. Proposal for UN R13H**

- 5.1.4.4.1.1. It shall be possible to evaluate the relationship between the brake demand value(s) and the measured braking force on a roller brake tester. The brake demand value(s) shall be displayed on the vehicle and easily readable from the driver's seat during the roller brake test (e.g., using a menu system, automatic demand, etc.). **Additionally As an alternative to displaying the values, it shall be possible to read ~~and record~~ the brake demand value(s) through a digital communication with the vehicle (e.g. the On-Board Diagnostics**

**(OBD) connector using a scan tool).** The vehicle manufacturer shall describe how to display ~~and-or~~ access those values and make this information available according to paragraph 5.1.4.3.1. above.

## IV. Justification

Justification for the proposals in blue:

- Creating an alternative instead of an additional requirement avoids the need for a new series of amendments with transitional provisions. A simple supplement to series 14 would work.
  - Deletion of the words “and record”: no need to specify the purpose of reading the values. It is the task of the off-board tool to record the values (if needed) once they are read. This is not a requirement for the vehicle.
  - No need to be design restrictive and mandate the use of OBD. OBD should only be given as an example (even if OBD looks like a natural solution for those OEMs willing to select this alternative). The interest is also to avoid defining and specifying OBD requirements in a brake regulation.
  - Changing “and” to “or” is to be consistent with the proposal to create an alternative.
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