

[REDACTED] (GROW)

From: [REDACTED] <[REDACTED]@acea.be>
Sent: 15 April 2015 09:27
To: [REDACTED] (GROW)
Cc: [REDACTED] (GROW); [REDACTED] (GROW)
Subject: Dynamic Boundary Conditions for RDE - Part 2
Attachments: 150415 to PJ & KS on RDE dynamic BCs P2.pdf

Importance: High

[REDACTED]
[REDACTED]
European Automobile Manufacturers' Association – ACEA

Avenue des Nerviens 85 | B-1040 Brussels | www.acea.be

T [REDACTED] | M [REDACTED] F [REDACTED] | [REDACTED] [@acea.be](mailto:[REDACTED]@acea.be)

15 April 2015

[REDACTED] G3, DG Growth

cc:

[REDACTED] G3, DG Growth

[REDACTED] unit G3, DG Growth,

Dear [REDACTED],

Subject: Real Driving Emissions (RDE)

In addition to the note sent to you earlier today addressing the Commission's request to ACEA concerning the RDE boundary conditions addressing stop periods and min/max average speeds during urban driving, ACEA would like to also address the following missing additional boundary conditions. Without these boundary conditions, a first package is not complete and cannot be accepted by ACEA.

Only when all RDE boundary conditions are agreed and included in the RDE Regulation can there be a meaningful discussion on the diesel NOx conformity factors that will apply in the two mandatory steps of RDE that will commence at a suitable date after the monitoring period.

Additional necessary boundary conditions:

The RDE expert group recently discussed additional boundary conditions. Independent experts confirmed the necessity of at least two additional boundary conditions, namely $v \times a_{pos}$ and road incline, and prepared corresponding proposals for both boundary conditions.

ACEA sees no reason why these two boundary conditions cannot be agreed as soon as possible and included in the first package now.

Dynamic boundary conditions to account for driving style and road incline:

ACEA recommends:

Dynamic BC	Possible sources of missing robustness, validity, plausibility	Threshold type	Indicator selection	U	R	M
Driving style	Loophole – driving too gentle	Lower limit	rpa (m/s ²)	Table 1.1		
	Mis-use – driving too harsh	Upper limit	95 th percentile of $(v \times a_{pos})$ [m ² /s ³] $a_{pos} > 0,1$ [m/s ²]	Table 1.2		

Dynamic BC	Possible sources of missing robustness, validity, plausibility	Threshold type	Indicator selection	U	R	M
Road incline	Insufficiently covered, only partly covered by normalisation tools	Validity	Cumulative positive altitude gain [m/100km]	1000m/100km		
			Start/end of trip	At the same altitude $\pm 100m$		

Table 1.1:

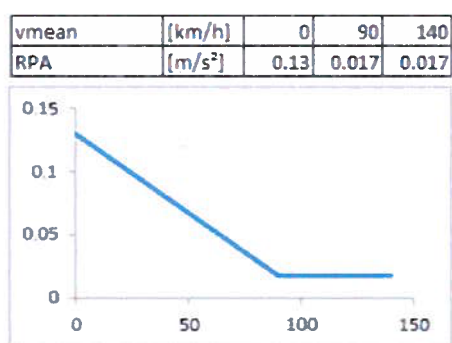
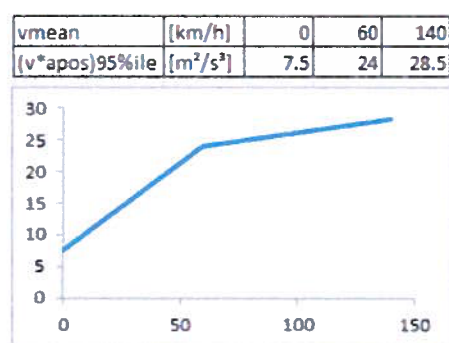


Table 1.2:



Industry will provide to the Commission the requested NOx values of a comprehensive test

program by the end of this week.

ACEA remains at your disposal to answer any further questions you or your colleagues may have.

