Benefits of Adopting a Flexible Motor Vehicle Certification System in Vietnam

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Charles D. Uthus, Vice President International Policy
Ideal: World Without Regulatory Borders

We live in an increasingly interrelated and integrated world

Global automakers build and sell in markets across the world, promoting trade and investment

The ideal is to test once and sell anywhere, maintaining high levels of safety and environmental protection.
There are 2 major sets of motor vehicle regulations

- **US Federal Motor Vehicle Safety Standards (FMVSS)** and **Environmental Protection Agency (EPA) rules**

- **UN Economic Commission for Europe (ECE) standards**, now referred to as **UN regulations** – (I.E. UN 127)
Both Systems Have Delivered Increases in Safety

- The data below demonstrates the significant reduction is Traffic fatalities in US & EU.
- The combination of advanced safety technologies developed by industry and Government regulations has led to this trend - saving hundreds of thousand of lives.
Vietnam’s Commitments as a Member of AFTA

• As a member of the ASEAN Free Trade Area (AFTA), Vietnam is scheduled to adopt UNECE Standards, starting with the initial set of UNECE standards.

• We support the ASEAN region working together to adopt a common set of auto regulations (UNECE). It is preferable to the adoption of a patchwork of unique standards or a unique mix of standards (some FMVSS and some UNECE).

• This, however, does not prevent Vietnam from adopting a flexible certification system that allows for vehicles certified to UNECE and FMVSS.

• By doing this, Vietnam can benefit from the best aspects of both systems, which are equally robust.
Benefits of Accepting U.S.-Certified Vehicles in Vietnam

1. Both are Robust, Long-standing & Tested

2. Both Have Comparable Performance & Outcomes

3. Reduces Cost and Increases in Efficiency

4. Brings Consumer Benefits

5. Global Automakers are ahead of government regulations and most often exceed requirements
Regulations and Certification Systems

All systems have regulations & certification

• **Regulations** – the requirements that must be met to the satisfaction of the regulator that a vehicle, system or component is fit for purpose.
  • Safety or Environmental.
  • Regulations are generally EU Directives, ECE Regulations or Federal Motor Vehicle Safety Standard (FMVSS). Also some national requirements

• **Certification** – The process by which the Manufacturer demonstrates compliance to the required regulations to the designated Government Regulator.
## Safety Regulations
(Examples)

<table>
<thead>
<tr>
<th>US regulation (see note 1)</th>
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<tbody>
<tr>
<td><strong>FMVSS No. 109 - New Pneumatic Tires</strong></td>
<td><strong>R 30- Pneumatic Tires (Passenger Vehicle)</strong>&lt;br&gt;<strong>R 54- Pneumatic Tires (Commercial Vehicles)</strong></td>
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<td><strong>FMVSS No. 111 - Rearview Mirrors</strong></td>
<td><strong>R 46 - Rear View Mirror</strong></td>
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<td><strong>FMVSS No. 114 - Theft Protection</strong></td>
<td><strong>R 18 - Protection Against Unauthorized Use (M.N)</strong></td>
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<tr>
<td><strong>FMVSS No. 118 - Power-Operated Window, Partition, and Roof Panel Systems</strong></td>
<td><strong>R 21 - Interior fittings</strong></td>
<td></td>
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<tr>
<td><strong>FMVSS No. 124 - Accelerator Control Systems</strong></td>
<td><strong>R 89 - Speed limitation devices</strong></td>
<td></td>
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<tr>
<td><strong>FMVSS No. 129 - New Non-Pneumatic Tires for Passenger Cars</strong></td>
<td><strong>R 30 - Pneumatic Tyres (Passenger Vehicle)</strong></td>
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<tr>
<td><strong>FMVSS No. 138 – Tire Pressure Monitoring System</strong></td>
<td><strong>R 64- tires- temp use or spare</strong></td>
<td></td>
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<tr>
<td><strong>FMVSS No. 139 – New Pneumatic Radial Tires</strong></td>
<td><strong>R 117- tires noise and wet grip</strong></td>
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<tr>
<td><strong>FMVSS No. 101 - Controls and Displays</strong></td>
<td><strong>R 39- Speedometer</strong>&lt;br&gt;<strong>R 121 - Hand controls, tell-tales and indicators</strong></td>
<td><strong>R 39- Speedometer</strong></td>
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<td><strong>FMVSS No. 102 - Transmission Shift Lever Sequence, Starter Interlock, and Transmission Braking Effect</strong></td>
<td><strong>R 35- Foot Controls</strong>&lt;br&gt;<strong>R 116- Unauthorized use (anti-theft &amp; alarm systems)</strong></td>
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**Comparable Crash Avoidance**
# Safety Regulations

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<td><strong>FMVSS No. 201</strong> - Occupant Protection in Interior Impact</td>
<td>R 21- interior fittings</td>
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| **FMVSS No. 202** - Head Restraints (aligned with Global Technical regulation No. 7) | R 17- Seats  
R 25- Head Restraints  
R 32- Rear End Collision | R 17- Seats  
R 25- Head Restraints |
| **FMVSS No. 203** - Impact Protection for the Driver from the Steering Control System | R 12- Steering Mechanism | R 12- Steering Mechanism |
| **FMVSS No. 205** - Glazing Materials (aligned with Global technical regulation No. 8) | R 43- Safety Glazing Material | R 43- Safety Glazing Material |
| **FMVSS No. 206** - Door Locks and Door Retention Components (aligned with Global technical regulation No. 1) | R 11- Door Latches and Hinges | R 11- Door Latches and Hinges |
| **FMVSS No. 207** - Seating Systems | R 17- Seats  
R 80- Seats (Large Passenger Vehicle) | R 17- Seats |
| **FMVSS No. 208** - Occupant Crash Protection | R 33- Head-on Collision  
R 94- Protection of the Occupants in the Event of Frontal Collision | |
| **FMVSS No. 209** - Seat Belt Assemblies | R 16- Seat Belt  
R 44- Child restraint systems | R 16- Seat Belt |
| **FMVSS No. 210** - Seat Belt Assembly Anchorages | R 14- Safety Belt Anchorages  
R 16- Safety Belts | R 14- Seat Belt Anchorages |
| **FMVSS No. 214** - Side Impact Protection | R 95- Protection of the Occupants in the Event of Lateral Collision | |
| **FMVSS No. 225** - Child Restraint Anchorage Systems | R 14- Safety Belt Anchorages  
R 16- Safety Belts  
R 44- Child restraint systems | R 14- Seat Belt Anchorages  
R 16- Seat Belt |

## Comparable Crash Worthiness

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| FMVSS No. 205 | R 43 - Safety Glazing Material |
| FMVSS No. 206 | R 11 - Door Latches and Hinges |
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| FMVSS No. 208 | R 33 - Head-on Collision  
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R 44 - Child restraint systems |
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<td>FMVSS No. 301 - Fuel System Integrity</td>
<td>R 34- Fire risks</td>
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<td>FMVSS No. 303 - Fuel System Integrity of Compressed Natural Gas Vehicles</td>
<td>R 34 – Fire risks R 110 - Vehicles using CNG</td>
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<td>FMVSS No. 304 - Compressed Natural Gas Fuel Container Integrity</td>
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<td>FMVSS No. 305 – Electric-powered Vehicle: electrolyte spillage and electrical shock protection</td>
<td>R 100- Electric Vehicle battery- crash provisions</td>
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**Note:**
- Red = Phase 1 (2015)
- Green = Phase 2
Emissions

Source – Delphi 2017 -2018
All systems are certified by the government or manufacturer and subject to approved regulations.

All systems are designed to protect the customer and ensure public safety.

Government Led

Manufacturer Led
Conclusion: Why Adopt a Flexible Motor Vehicle Certification System?

- Much work remains to create a comprehensive regime of truly harmonized Global Technical Regulations (GTRs) – leading to the ideal of test once and accept everywhere.
- In the meantime, there is a two standards world. FMVSS/EPA and UNECE both deliver the highest safety and environmental performance and outcomes.
- Certification is the process by which the Manufacturer demonstrates compliance to the required regulations to the designated Government Regulator.
- Economies can maintain flexible certification systems by allowing for different but equally robust standards while maintaining safety performance & outcomes for consumers.
- Economies and their consumers can gain from more choice and competitive prices.
- Limiting certification to one system limits choice, reducing opportunities for price competitiveness and technological innovations.