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**Sent:** 13 March 2015 09:54

**To:** [REDACTED] (ACEA); [REDACTED] (Daimler AG); [REDACTED] (Audi AG); [REDACTED] (BMW Group)

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**Subject:** RDE legislative text: some results from inter-service consultation (ISC)

Dear colleagues,

From ISC we had two requests for substantial modifications of the text. We have discussed them with some key Member States, which did not object them. Therefore, with a view to a possible vote on the RDE test procedure at the TCMV of 24 March I would ask you for your views.

1. The draft RDE test procedure submitted to ISC suggests a share of 26%/44%/30% for the urban/rural/motorway driving at the data evaluation for determining the total trip emissions (NB: these are the figures given in Appendix 5 and 6, not to be mixed up with the trip composition figures defined in points 6.3 – 6.5 of Annex IIIa!). These figures were suggested by ACEA, apparently based on estimates from real driving data, but the completeness and reliability of these data as well as the detailed procedure to calculate the u/r/m shares are unknown or ambiguous. As a consequence it was requested to introduce a "balanced" share of 34%/33%/33% for u/r/m in a neutral manner. These shares would have to be reviewed in the course of the monitoring phase, what would be expressed in one of the political intentions of the Commission.
2. There are some serious concerns about the lack of a vehicle power criterion for the definition of PEMS test families (i.e. a vehicle power range to be added to point 3.2 of Appendix 7) or the selection of vehicles for PEMS testing (i.e. a requirement to test the vehicles with highest/lower power to be added to point 4.2 of Appendix 7) due to the fact that engines will be ever more downsized and there is a tendency to use "the same" physical engines, the power of which is just adapted by software changes, for a wide range of vehicles of a single manufacturer.
3. We would add to point 4.2 of Appendix 7 the requirements to PEMS-test at least one 4x4 vehicle (if 4x4 drive vehicles are part of given PEMS test family) and at least one vehicle of each engine volume (replacing point 4.2.4) .

Could you please come back with your views until Monday, 16/3 COB?

Thanks,

[REDACTED]

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[REDACTED]

**European Commission**

DG GROWTH

G.3 Sustainable Mobility and Automotive Industries

[http://ec.europa.eu/growth/sectors/automotive/index\\_en.htm](http://ec.europa.eu/growth/sectors/automotive/index_en.htm)

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