

To whom it may concern,

Introduction

This document aims to formally describe and explain that our product is classified as Category B (Cat. B) according to Informal Document GRVA-18-37, and why it is therefore not subject to UN Regulation No. 155 or No. 156.

Product Name: Electrical Infrastructure for Coupling Systems

Type Approval: E5*10R05/01*0384

Definition of Category B (Cat. B): Changes which are cyber-relevant or related to the E/E architecture but only with "read-access."

Justification:

E/E Architecture Impact: The product adds hardware and is directly powered by the vehicle's battery, providing read-only (analogue) or read-write (analogue) access to the vehicle's electronic systems. Furthermore, the system is not designed for software updates post-production.

Option Read-Only Access: In this configuration, the product has only read-access to an analogue output signal from the vehicle's E/E architecture, e.g., the vehicle manufacturer's body builder module to receive the "reverse signal." It is designed to interact with the system without making any modifications to data or functionality.

Option Read-Write Access: In this configuration, the product has read access, as described above. Additionally, it has write access to one or two analogue input signals within the vehicle's E/E architecture. The product interfaces with one or two analogue inputs dedicated to indication control of "Double Locked Coupling" and "Not Double Locked Coupling" in the vehicle instrument cluster. It is the integrator's responsibility to ensure that only interfaces provided and authorized by the vehicle manufacturer are used for this purpose.

Cybersecurity-Relevant Functionality: The product contains no functionality that is directly related to cybersecurity. It does not store, process, or transmit any security-critical information that could expose the vehicle to cyber threats.

Conclusion

Based on the above justification, we conclude that our product, "Electrical Infrastructure for Coupling Systems," shall be classified as Cat. B since both read and write access to the vehicle's E/E system are analogue. Furthermore, the optional write access exclusively utilizes dedicated interfaces provided by the vehicle manufacturer and therefore falls under the cybersecurity assessment done by the vehicle manufacturer. Due to these specific characteristics, it is not subject to the requirements of UN Regulation No. 155 or No. 156, as it poses no cybersecurity or software update risks to the vehicle's E/E architecture



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