

Transmitted by the expert from OICA

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 107

Note: The text reproduced below was prepared by the experts from OICA as an attempt to improve the text of informal document GRSG-95-06. Changes to the original text of document GRSG-95-06 are in bold and strikethrough characters. For a better understanding, some paragraphs before and after the proposed amendments have been reproduced whilst they remain unchanged.

**A. PROPOSAL**

Annex 3, insert new paragraphs 7.7.13. to 7.7.14.7.1., to read:

"7.7.13. Driver's compartment

7.7.13.1. The driver shall be protected from standing passengers and from passengers seated immediately behind the driver's compartment who may be projected into the driver's compartment in the event of braking or cornering. This requirement shall be deemed to be satisfied if:

7.7.13.1.1. the rear of the driver's compartment is enclosed by a partition; or

7.7.13.1.2. ~~in the case where the floor of the driver's compartment and that of the relevant passenger seating area are at approximately the same height, with no steps between them,~~ the passenger seats **located immediately behind the driver's compartment** are fitted with safety belts in accordance with Regulation No. 16 **(not applicable to vehicles having an area available for standing passengers immediately behind the driver's compartment)**; or

7.7.13.1.3. the vehicle is fitted with a guard complying with the requirements specified in paragraphs 7.7.13.1.3.1. to 7.7.13.1.3.3. (see annex 4, figure 30).

7.7.13.1.3.1. The minimum height of the guard measured from the floor on which the passenger's feet rest shall be 800 mm.

....."

## **B. JUSTIFICATION**

OICA welcomes the proposal from France to harmonize the requirements for the driver's workplace and the protection of the driver against the possible projection of standing passengers.

The intention of protecting the driver from the passengers seated immediately behind him in the event of braking and cornering, proposed by France in the amendment to paragraph 7.7.13.1.2. of Annex 3, is well understood. However, OICA fears that the proposed wording brings unexpected burdens to the manufacturer.

### **Seating passengers**

The wording proposed by France indeed implies the obligation to install seatbelts as from the time a step is present between the driver's compartment and the passenger seating area. This would be true whatever the height of the step. Clearly this criterion goes beyond the original intention of exempting vehicles where the difference of height between the two areas diminishes the danger for the driver.

OICA suggests to solve that problem by erasing the criterion of the presence of a step.

### **Standing passengers**

It is expected that the presence of seats immediately behind the driver's compartment prevents standees to stand directly behind the driver. However, should some space be available between the seats and the driver's compartment, the requirement wouldn't be respected hence the driver must be protected.

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