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agenda item 3(a))

Proposal for amendments to Regulation No. 107 (M<sub>2</sub> and M<sub>3</sub> vehicles)

Addendum 106: Regulation No. 107 Revision 2 - Amendment 3 - Supplement 5 to the 02 series of amendments:

**A. Proposal**

*Annex 3, paragraph 7.7.14.7., amend to read:*

7.7.14.7. The seat shall be adjustable in its longitudinal and vertical positions and in its seat back inclination. It shall lock automatically in the selected position and, if fitted with a swivelling mechanism, it shall lock automatically when in the driving position. ~~The seat shall be equipped with a suspension system~~

7.7.14.7.1. ~~The suspension system and the~~ vertical position adjustment ~~are~~ is not mandatory for vehicles of Class A or B."

**B. Justification**

1. Approval regulations should only deal with essential matters of safety for the driver, passengers and other road users. They should not deal with comfort or typical usage. A suspension seat for the driver should not therefore be mandatory.
  2. A survey of drivers suggests that they have less control over the speed and braking of a bus when traversing traffic calming measures when seated on a "suspension" seat in comparison with a static seat without an air or hydraulic system. Passengers are therefore at greater risk of injury due to a less smooth ride.
  3. Drivers are not at risk of exceeding the maximum exposure for whole body vibration during a typical shift. Therefore a static seat is adequate.
  4. Suspension seats cost more to buy and maintain than static seats.
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