Submitted by the expert from OICA

Informal document No. **GRSG-101-20**
(101st GRSG, 18-21 October 2011
agenda item 5)

Proposal for changes to Regulation No. 46 (DEVICES FOR INDIRECT VISION)

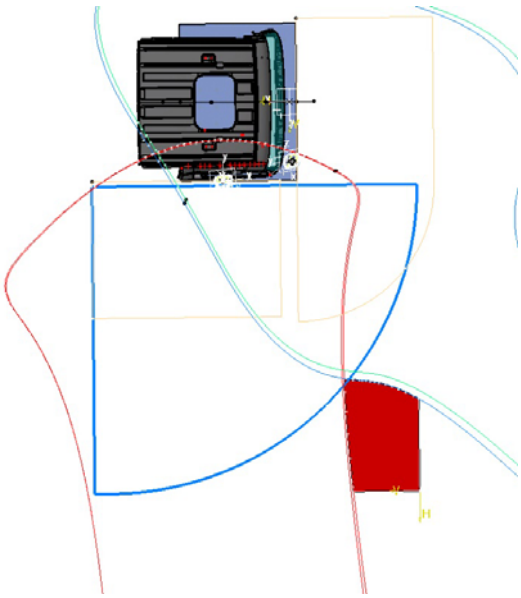
Changes to the current text of the Regulation are indicated in bold and strike-through characters.

I. Exchange of view

1. Results of tests performed on the field show a different situation for high mounted mirrors compared to low mounted mirrors. The laws of trigonometry show that the mounting height of the mirror influences the area covered on the ground.
2. Most N3 vehicles have a high mounted cab, safe some exceptions (refuse collectors, etc.). Most N2 vehicles are low cab vehicles safe some exceptions (DATA REQUESTED).
3. N3 vehicles:
    a. Mounting height is such that it appears the concern could possibly be solved by “fast track” solution
    b. Still concern for space available at the mounting point, as new mirror is expected to be wider than current one
    c. Exemptions should be considered as well when N3 is equipped with low cab.
    d. Transitional provisions have to be introduced for research (cab design accommodation), testing (robustness, vibrations), validation then adaptation of the production.
4. N2 vehicles:
    a. Cab height such that direct vision can most of the time cover the concern
    b. Mounting height such that concern cannot be solved in 1st step
    c. Concern for space available at the mounting point is even more critical than for N3, as new mirror is expected to be wider than current one
    d. Case of high cabs should be addressed
5. Tests performed on the field show that existing mirrors interfere with new mirror if proposed FOV remains unchanged
6. Also existing mirrors can cover one part of the field requested by the UK: combination of mirrors must be possible
7. Sensing technologies must be acceptable to a reasonable extend
8. Evaluate combination with Regulation No. 125 (direct FOV)

II. Proposed basis for a way forward

1. Step 1:
    a. New FOV mandatory for N3
    b. New FOV mandatory for N2 with high cabs (HOW TO DEFINE THEM?)
    c. New FOV adapted to address
        i. Interference with existing mirrors
        ii. Capacity of new mirror to cover FOV (rounded angle could provide solution – see figure)



iii. FOV can be covered by combination of mirrors

iv. Integration of sensing systems to be considered

d. Exemptions for N3 with low cabs (how to define them?), special purpose vehicles, etc

e. Reasonable transitional provisions

f. Regulatory proposal ready for GRSG-102 (April 2012)

2. Step 2

a. New FOV mandatory for all N2

b. Revision of the exemptions for N3 (low cabs)

c. New FOV adapted to address direct FOV (possible combination with R125)

d. Reasonable transitional provisions

e. Regulatory proposal ready for GRSG-104 (April 2013)

III. OICA offer

OICA would be happy to hold multilateral discussions with the interested parties at GRSG, for discussing a solution along the lines of the proposed way forward proposed above. Some test conducted on the field provided results which the manufacturers are ready to share.

The target of this offer is to produce a complete and sustainable proposal (possibly to be enforced in 2 steps) for the 102nd session of GRSG, in April 2012.