Submitted by the expert from OICA

Informal document **GRSP-54-19-Rev.2**, (54<sup>th</sup> GRSP, 17-20 December 2013, agenda item 8)

# Proposed amendments to ECE/TRANS/WP.29/GRSP/2013/4 (Proposal by Germany of Supplement 6 to the 07 series of amendments to Regulation No. 14)

## I. Proposal

"4.2

#### Title, amend to read:

"Proposal by Germany of Supplement 6 to the 0708 series of amendments to Regulation No. 14"

#### Para. 4.2., amend to read:

An approval number shall be assigned to each type approved. Its first two digits (at present 0% corresponding to the 0% series of amendments) shall indicate the series of amendments incorporating the most recent major technical amendments made to the Regulation at the time of issue of the approval. The same Contracting Party may not assign the same number to another vehicle type as defined in paragraph 2.2. above."

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#### Paragraph 5.3.8.2., amend to read:

- "5.3.8.2. Notwithstanding paragraph 5.3.8.1., if a vehicle is only equipped with one seat row with at least two seat positions, only one ISOFIX position is required. "
- Paragraph 5.3.8.7., amend to read:

"5.3.8.7. Notwithstanding the provision of the paragraph 5.3.8.1., convertible vehicles as defined in Annex 7, paragraph 8.1. of the Consolidated Resolution on the Construction of Vehicles (R.E.3) with more than one seat row shall be fitted with at least two ISOFIX low anchorages. In case where an ISOFIX top tether anchorage is provided on such vehicles, it shall comply with the suitable provisions of this Regulation.

Insert new paragraph 5.3.8.8., to read:

"5.3.8.8. Notwithstanding paragraph 5.3.8.1., if a vehicle is only equipped with one seat position per row, only one ISOFIX position is required in the passenger position. However where it is not possible to install even the smallest forward-facing ISOFIX fixture (as defined in Regulation No. 16, Appendix 2, of Annex 17) in the passenger seating position then no ISOFIX position shall be required, provided that a "vehicle specific" child restraint system is available for that vehicle."

Paragraphs 5.3.8.8.and 5.3.8.9. (former), renumber as paragraphs 5.3.8.9. and 5.3.8.10.

#### Insert new paragraphs 14.20 to 14.22, to read:

"14.20. As from the official date of entry into force of the 08 series of amendments, no Contracting Party applying this Regulation shall refuse to grant type approval under this Regulation as amended by the 08 series of amendments."

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- "14.21. As from 36 months after the official date of entry into force of the 08 series of amendments, Contracting Parties applying this Regulation shall grant type approvals only to those types of vehicle which comply with the requirements of this Regulation as amended by the 08 series of amendments."
- "14.22. Even after the date of entry into force of the 08 series of amendments, Contracting Parties applying this UN Regulation shall continue to accept type approvals to the 07 series of amendments."

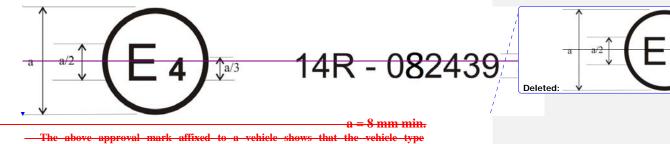
Annex 2, amend to read:

# Annex 2

#### Arrangements of the approval mark

#### Model A

(see paragraph 4.4. of this Regulation)

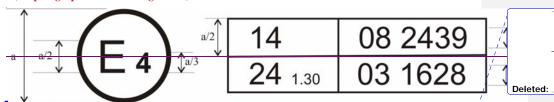


The above approval mark affixed to a vehicle shows that the vehicle type concerned has, with regard to safety-belt anchorages, been approved in the Netherlands (E 4), pursuant to Regulation No. 14, under the number 082439. The first two digits of the approval number indicate that Regulation No. 14 already included the 08 series of amendments when the approval was given.

#### Model B

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(see paragraph 4.5. of this Regulation)



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— The above approval mark affixed to a vehicle shows that the vehicle type concerned has been approved in the Netherlands (E 4) pursuant to Regulations Nos. 14 and 24<sup>±</sup>, (In the case of the latter Regulation the corrected absorption co-efficient is 1.30 m<sup>-1</sup>). The approval numbers indicate that on the dates on which these approvals were granted, Regulation No. 14 included the 08 series of amendments and Regulation No. 24 was in its 03 series of amendments.

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The second number is given merely as an example.

# **II.** Justification

#### Title

Taking into account that the proposal entails technical changes, OICA considers that a series of amendments is more appropriate than a Supplement.

#### Paragraph 5.3.8.2.

The current text of UN Regulation No. 14 requires the installation of at least two ISOFIX positions in vehicles of category  $M_{\perp}$ . Vehicles with only one seat row are currently exempted from this requirement.

The proposal by Germany foresees that such vehicles with only one seat row should be fitted with one ISOFIX position. OICA understands this proposal in the case of "classical" vehicles which have entered the market in the recent years, such as shown in Figure 1. However, OICA also believes that this requirement would be excessively severe for vehicles as shown on Figure 2 below. Such vehicles are clearly not intended to transport children and should probably best be exempted from the ISOFIX installation requirement.





Figure 2

Figure 1

### Paragraph 5.3.8.7

This proposal by OICA extends the partial exemption for convertible vehicles, taking into account the new requirements of § 5.3.8.2. which would require at least one ISOFIX position in vehicles with only 1 row of minimum 2 seats. The current requirements of R14 exempt such vehicles with 1 seat row totally and therefore also foresaw a specific derogation for convertibles with more than 1 seat rows. It is therefore necessary to extend this derogation to all convertibles taking into account their specific design.

#### Paragraph 5.3.8.8.

This paragraph specifically addresses the case of so-called "tandem" concepts of new urban vehicles, with only one seat per row (passenger behind the driver). In such case, the proposal would require the passenger seat to be an ISOFIX position. If however it is not possible to install even the smallest forward-facing ISOFIX fixture, then it should be allowed to foresee a "vehicle specific" child restraint system for that vehicle.

#### Paragraphs 14.20 to 14.22.

Transitional provisions are proposed to be added, such that new approvals would be required to meet the new requirements 36 months after entry into force.

Secondly, the number of vehicles affected by the new requirements will be limited and OICA therefore considers that approvals previously granted to these vehicles should continue to be recognised by Contracting Parties applying the Regulation.

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