Proposal for amendments to UN Regulation No. 107 $(M_2 \text{ and } M_3 \text{ vehicles})$

The text reproduced below was prepared by the expert from Germany to clarify the requirements concerning the height of steps in vehicles which comply to Annex 8. The modifications to the existing text are marked in bold for new or strikethrough for deleted characters.

I. Proposal

Annex 8, paragraph 3.1., amend to read:

"3.1. Steps

The height of the first step from the ground of at least one service door shall not exceed 250 mm for vehicles of Class I and A and 320 mm for vehicles of Classes II, III and B. In the case where only one service door meets this requirement there shall be no barrier or sign which prevents that door from being used as both an entrance and an exit.

As an alternative for vehicles of Classes I and A, the first step from the ground shall not exceed 270 mm in two door openings, one entrance and one exit.

A kneeling system and/or retractable step may be engaged.

The height of steps in an access passage at the above-mentioned door(s), and in **throughout** the **entire** gangway, shall be not more than 200 mm for vehicles of Classes I and A and 250 mm for vehicles of Classes II, III and B.

The transition from a sunken gangway to a seating area shall not be considered to be a step."

II. Justification

Currently interpretations have occurred that limit the application of the step height requirement to that part of the gangway that leads to the priority seats. As it is unjustified to limit the area where a person with reduced mobility may use to such a degree the proposal clarifies that the step height requirement is valid along the entire length of the gangway.
