

Proposal for amendments to Regulation No. 125

Uniform provisions concerning the approval of motor vehicles with regard to the forward field of vision of the motor vehicle driver

The text reproduced below has been prepared by the expert from the United Kingdom to explain our concerns about the absence of an appropriate field of view requirement for drivers of N₁ vehicles.

Background

An accident occurred where an N₁ security vehicle collided with a child who was crossing the entrance to a supermarket carpark. The child was fatally injured. We were contacted by the Coroner investigating the case to identify whether changes could be made to vehicle design to prevent the recurrence of such an accident.

The vehicle had been modified from the original specification of the manufacturer by the removal of the side windows and the fitting of plastic glazing on both sides of the driver's cab area, and a frame of strengthening material fitted to the replacement glazing. This reduced the side vision for the driver of the vehicle.

Extracts from the relevant Regulations are set out below: Regulation No. 125 is limited in scope to M₁ category vehicles, and Regulation No. 46 only requires the driver to have a view of the mirrors.

Regulation No. 125 is limited in scope to M₁ category vehicles:

Scope

- 1.1. This Regulation applies to the 180° forward field of vision of drivers of category M₁ vehicles.
- 1.2. Its purpose is to ensure an adequate field of vision when the windscreen and other glazed surfaces are dry and clean.
- 1.3. The requirements of this Regulation are so worded as to apply to category M₁ vehicles in which the driver is on the left. In category M₁ vehicles in which the driver is on the right these requirements shall be applied by inverting the criteria, when appropriate.

Regulation No. 46 has provision for the driver to be able to see mirrors through the side windows:

15.2.2. Position

- 15.2.2.1. Mirrors shall be so placed that the driver, when sitting on the driving seat in a normal driving position, has a clear view of the road to the rear, side(s) or front of the vehicle.
- 15.2.2.2. Exterior mirrors shall be visible through the side windows or through the portion of the windscreen that is swept by the windscreen wiper. Nevertheless, for design reasons, this last provision (i.e. the provisions relating the cleaned part of the windscreen) shall not apply to:
 - (a) Exterior mirrors on the passenger side and optional exterior mirrors on the driver side of vehicles of categories M₂ and M₃;
 - (b) Class VI mirrors.

II. Justification

Consideration was given to introducing provisions to the annual roadworthiness test to require adequate view to the side from the driver's seat, but as the vehicle had been approved correctly, and there is no standard for driver vision for N₁ vehicles we would welcome the views of GRSG to enable us to consider how to proceed.
