

COMMENTS TO GRT-0 (DOCUMENT TRANS/WP.29/GRSG/2003/10)

Transmitted by the expert of the Netherlands

1. Proposal 1

Annex 3, paragraph 2.1, concerning “unladen vehicle mass”:

- 2.1. Mass of the unladen vehicle with bodywork and all electrical and auxiliary equipment for normal operation of vehicle, including liquids, tools, fire extinguisher, standard spare parts, chocks and spare wheel, if fitted.

amend to read:

- 2.1 Mass of the unladen vehicle with bodywork and all factory fitted accessories ~~electrical and auxiliary equipment for normal operation of vehicle~~, including liquids, tools, fire extinguisher, standard spare parts, chocks and spare wheel, if fitted.

Justification:

Most accessories are not necessary “for normal operation” and will not be taken into account in the present wording. It will result in an artificial low mass based on a vehicle without any accessory. We believe that the “unladen vehicle mass” should be the real unladen mass of the actual vehicle as it is at the moment that the vehicle is leaving the factory including all accessories.

2 Proposal 2

Annex 3, paragraph 8 concerning “maximum towable mass”:

8. “Maximum towable mass” means the maximum mass capable of being towed by a vehicle as defined by the vehicle manufacturer.

amend to read:

8. “Maximum towable mass” means the maximum mass capable of being towed by a vehicle as defined by the vehicle manufacturer taken into account the passenger mass and additional provisions for luggage for the maximum number of seats. In addition, the manufacturer may specify in the owner’s manual other towable masses, provided that restricted loading conditions are indicated.

Justification:

For safety reasons the “maximum towable mass” should be a mass that the vehicle can tow under all loading conditions. If it is based on restricted conditions (this is done for commercial and competitive reasons) the vehicle combination may be “overloaded” and create dangerous situations.

On the other hand we understand that a vehicle can tow a heavier trailer when no passenger seats are occupied; for that reason the owner’s manual should state the condition under which a heavier trailer can be towed.

3. Proposal 3

Annex 4, dimensions

Insert between “DIMENSIONS” and “For the purpose of Global Technical Regulations:” the following text:

“All dimensions shall be determined with the vehicle at its unladen vehicle mass.”.

Justification:

For practical reasons it would be easier to measure the dimensions when the vehicle is unladen.