

Comment of Denmark on document TRANS/WP.29/GRRF/2005/18 from 3 August 2005

A: TEXT AND PROPOSAL

Current text of the coming GTR:

- 3.1.3. 3-wheeled vehicles of categories 3-2 and 3-4 shall be equipped with a parking brake system plus one of the following service brake systems:
 - 3.1.3.1. two separate service brake systems which, when applied together, actuate the brakes on all wheels, or
 - 3.1.3.2. a service brake system that operates on all wheels and a secondary brake system which may be the parking brake, or
 - 3.1.3.3. a split braking system which actuates the brakes on all wheels, actuated through a single control.

The corresponding text in ECE Regulation 78 Amendment 2, 11 April 1995 is as follows.

The text from Regulation 78:

- "5.2.4. Every vehicle of category L5 shall be equipped:
- 5.2.4.1. with a foot controlled service braking device which operates on all the wheels, and a secondary (emergency) braking device which may be the parking brake, and
 - 5.2.4.2. with a parking braking device acting on the wheels of at least one axle. The control of the parking braking device must be independent of the control of the service braking device."

Proposal

The text in the GTR must be aligned with ECE Regulation 78 (category 3-4 corresponds to L5 in R78), so that category 3-4 always has a single, foot-operated service brake.

B: JUSTIFICATION

Braking a (2-wheeled) motorcycle with separate brakes front and rear is not quite easy. Even obtaining the weak demands for the service brake performance demands some skill of the driver.

In Europe it has many years ago been decided, that braking of 3-wheeled vehicles (which could be quite big and heavy vehicles with one or more passengers) should not demand more skill than braking a car. In other words the service brake should be a single foot controlled device.

Allowing separate brake systems front and rear would be a big step backwards compared with the existing rules, which could not be tolerated for a GTR.

Sticking to the existing demands for the brake system configuration is far more important for the real world braking than e.g. discussion about the level of performance for stopping distance (or deceleration).