

AMENDMENTS TO UNECE REGULATION No. 11
COMMENTS TO TRANS/WP29/GRSP/2005/9 AND GRSP-37-3

Transmitted by the expert from OICA

I - TRANSPOSING GTR1 INTO UNECE REGULATION No. 11

Following the adoption in November 2004 of the very first Global Technical Regulation, addressing door retention components, the EU Commission expert has transmitted to GRSP a proposal to align the existing UNECE Regulation with this GTR1.

Notwithstanding the fact that some technical/editorial comments are to be made to the EU proposal, OICA wishes to point that this proposal also addresses, for the very first time, the transposition of a Global Technical Regulation into the framework of the 1958 Agreement.

In this particular respect, OICA has submitted to WP29/AC.3 document TRANS/WP29/2005/53 which will be reviewed at the WP29/AC.3 session of June 2005. Part of this document indeed addresses this issue and attempts to list the various possibilities to transpose a GTR into the 58 Agreement, as seen by OICA.

OICA therefore urges GRSP not to make any decision on the EU proposal until WP29 and AC.3 have had all the opportunities to review in detail all implications of the various possibilities and provide the various Working Parties with any necessary guidelines.

II - TECHNICAL COMMENTS TO THE EU PROPOSAL

Notwithstanding item I above, OICA has the following preliminary comments to make to the EU proposal TRANS/WP29/GRSP/2005/9 and GRSP-37-3:

1) Paragraph 1 – Scope (see GRSP/2005/9)

Amend to read: "*... of categories M1 and N1, intended for entry or exit of the occupants.*"

Reason: The current R11 only applies to M1/N1 vehicles. Account should also be taken that many N2/N3 vehicles are manufactured in a multi-stage approach for special purpose vehicles. In addition, OICA wishes to remind GRSP that, when GTR1 was being developed, two basic principles were discussed:

- a) Restrict the scope of the GTR to the minimum, with the possibility for authorities to expand the scope on a national/regional basis;
- b) Enlarge the scope of the GTR to the maximum, with the possibility for authorities to restrict the scope on a national/regional basis.

Since the second principle was retained for GTR1, GRSP should review any justification to expand the scope of Regulation N° 11 beyond what exists today.

Finally, there is a clear need to incorporate the concept of passenger access, as foreseen in GTR1, paragraph 2.

2) Paragraphs 6.1.4.1 to 6.1.4.3 (see GRSP-37-3)

Should read: "*Paragraphs 6.1.4.1 and 6.1.4.3.*"

Reason: Editorial correction.

3) Paragraph 2.3.1 (see GRSP/2005/9)

Add a paragraph number "*2.3.1.1*" before the words "*The door assembly(ies) including ... and the locking device(s).*"

Reason: Editorial correction.
