

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 94

(Frontal collision protection)

Comments to ECE/TRANS.WP.29/2006/29

Transmitted by the expert from OICA

**I. INTRODUCTION**

OICA welcomes the proposal submitted by Japan, aimed at ensuring that Japan is in a position to apply UNECE Regulation 94. This proposal seems to provide an elegant solution to the previous problem, accommodating the desire of all parties for new Contracting Parties to be able to adopt the Regulation, without introducing new concerns for existing Contracting Parties.

However, OICA wishes to propose a minor revision to the text of the proposal submitted by Japan, as follows.

**II. PROPOSAL TO AMEND ECE/TRANS/WP.29/2006/26**

Proposed new paragraph 11.3., amend to read:

"11.3 As long as there are no requirements in this Regulation **with regard to a full frontal impact test**, Contracting Parties may continue to apply such requirements as they have in force for that purpose at the time of acceding to this Regulation."

**III. JUSTIFICATION**

OICA believes that the original text as proposed by Japan could be misunderstood to imply that vehicles approved to Regulation 94 do not provide protection in a full frontal collision. This, of course, is not the case and OICA proposes the above minor amendment to better reflect this fact, namely that the existing UNECE Regulation 94 aims at verifying the frontal impact occupant protection, using an offset frontal impact test, without the use of a full frontal impact test.

-----