

**COMMENTS TO THE PROPOSAL FOR DRAFT 03 SERIES OF AMENDMENTS
TO UNECE REGULATION No.29- 02, INCLUDING SUPPL.1
(Cabs of commercial vehicles)**

Note: The text reproduced below was prepared by the expert from the Czech Republic in order to explain his actual position: 1) to the basic document TRANS/WP.29/GRSP/2002/18 of 30 Sept.2002 transmitted by the **United Kingdom** to the 32th GRSP Meeting (sufficiently involving the recommendations from the informal document transmitted by the **Czech Republic** to the 23th GRSP Meeting in May 1998), 2) to the document ECE/TRANS/WP.29/GRSP/2006/5 of 3 March 2006 transmitted by the **Russian Federation** to the 39th GRSP Meeting, 3) to the **OICA** comments to the GRSP Informal Meeting on 15 May 2006. The text is transmitted to the current Meeting of GRSP for consideration. (The previous document of **Czech Republic** was transmitted to the 32th GRSP Meeting in Dec.2002).

The modifications to the current text of the Regulation concerned are marked in **bold** characters.

I. General

We prefer further development of the UK document (using the tests A,B,C, but without tests D,E) originally required in the RF document.

(Justification: We reject to open new test procedures only for a part of vehicle sizes. The proposed two new tests require from the authorized technical services to built two further huge test facilities (Swedish pendulum, new static pushing facility) to the now existing ones. They are similar to the original ones but agresivities of their effects differ and are mostly uncomparable or at least (in the case of bonneted cabs) unsure. Why not improve only the parameters of the existing procedures for A, B tests (see Ann.3, § 4.2.4) instead of amendment of test equipment? The way proposed by RF seems to be the most expensive one.

II. Scope

Para. 1 Scope (*see ECE/TRANS/WP.29/2006/115 of 13 July 2006, following TRANS/WP.29/GRSP/2005/13 of 16 Sept 2005*). We agree with the new valid definition „**This Regulation applies to vehicles of category N with regard to the protection of the occupants of the cab**“ supposing that the mentioned condition of the **driver’s cab existence** (*expression cab could be explained among the definitions too*) is equal to our limit on **cabs as a compartment separated from delivery box/load area**. Anyhow that wording must be combined with the following amendments in item III.

III. Requirements

Para. 5.2 (UK) (*compare also with para. 4.2.2, 5.4(RF)*), amend to read: „Vehicles or cabs for vehicles, not exceeding **7,5** tonnes TPMM (*see III.(OICA)*). shall be subjected, at the manufacturer choice, to all the tests specified in annex 3 to this Regulation or only to tests A and B. **However, a vehicle type which has met the test requirements according to Regulation No.94 may be considered to have satisfied the requirements for tests A and B, just as a vehicle type which has met the test requirements according to the new draft Regulation** (*see draft TRANS/WP.29/2005/88 of 7 March 2005, following TRANS/WP.29/GRSP/2004/19/Amend1 of 7 March 2005 transmitted by CLEPA*) **may be considered to have satisfied the requirements for tests B and C**. One, two or three cabs, at the manufactrer choice, shall be used for this purpose.“

All references to tests D,E: shall be deleted.

IV. Manikin.

Annex 6, Appendix 2 (UK), amend to read: „a - Distance between hip point centres **variable from 21,6 up to 42,4 cm.**“

Paragraph 5.5.1 (UK). amend to read: „...For this purpose, the seat shall be adjusted to its most rearward position and the manikin completely assembled and so placed that its H point coincides with the R point **and the distance a between knee/hip point centres is equal to the distance between the brake pedal and the clutch pedal.** The seat shall.....“

(Justification: The existing UNECE manikin does not comply with the requirements for its use in trucks and buses as well as the American one does. The adjusting range is chosen to be in compliance with the UNECE 3D-H machine.)

V. Pendulum.

Delete para. 5.5.3 to 5.5.5 (UK) and Annex 6 (UK): Not to introduce new test equipment, i.e. the tests D (with static pushing machine) and E (with pendulum suspended on chains). Our support to para.IV.a up to IV.d (OICA).

Delete para.4.1.3.1 to 4.1.3.3 of Annex 3 (UK), mark with numbers in next text the lines „**4.1.4.** The distance a...“ and „**4.1.5.** The reduced mass m_a “

Para.4.2.2 of Annex 3 (UK), amend to read: „The geometric centre of its striking face shall be 50 +5/-0 mm below the R point for the driver’s seat **but in any case inside limits, on the upper side given by the face centre position 1400 mm above the ground and on the other side given by the lower edge of the striking face closely over the front bumper connected directly to the vehicle frame.**“
