

PEDESTRIAN PROTECTION
OICA COMMENTS TO THE DRAFT GTR ADOPTED BY GRSP IN MAY 07

Transmitted by the representative of OICA

First of all, OICA wishes to confirm its full support for the development of a global technical regulation on pedestrian protection, as conducted by the GRSP Informal Group and subsequently finalised at the 41st session of GRSP in May 07.

OICA supports in general the compromise agreed upon at GRSP, but has some comments regarding the issue of the so-called flat front vehicles, as explained below.

GRSP-41 agreed to recommend to WP29/AC3 that such flat front vehicles, where the longitudinal distance D between the front axle and the driver's seat R-point is less than 1000 mm, be excluded from the application of the gtr, if they are vehicles of Category 1-2 (i.e. buses) or Category 2 (commercial vehicles).

OICA fully understands the remarks made by France and Italy at GRSP-41 that this exemption should equally apply to Category 1-1 vehicles (i.e. passenger cars), for the following obvious reasons:

1. It is widely recognised that the most crucial parameter to determine whether or not a vehicle should be included in the application of the gtr is the shape of the front of the vehicle. Its category or mass plays only a secondary role.
2. There are very good reasons to exclude flat front vehicles from the scope/application of the gtr:
 - a. The studies conducted for the drafting of the gtr were based on classical sedan-type shapes and did not really take into account flat front vehicles, where the front shape is close to the vertical (e.g. where the bonnet effective angle as defined in the Japanese legislation exceeds 40°) and where the bonnet is very short (e.g. several goods delivery vans)¹; such vehicles can be considered as "equivalent" to the former "forward control vehicle".
 - b. The tests foreseen in the gtr are most likely not applicable/relevant to flat front vehicles:
 - i. Real life pedestrian kinematics for this type of vehicle are different from those represented by the gtr
 - ii. Determination of the reference lines for the test zones may be extremely difficult for flat front vehicles due to their vertical shape
 - iii. Even when it is possible to define a test area, it is most likely to be extremely small, rendering the definition of the test points very difficult.
3. There is absolutely no reason to treat the flat front vehicles differently, depending on whether they are passenger cars of buses or commercial vehicles

¹ Such uncertainties were also recently highlighted by TRL in its 2006 final project report (UPR/VE/045/06 under EC contract ENTR/05/17.01) to the European Commission.

4. In addition, there may often be vehicles produced in both configurations, i.e. one version produced as a commercial vehicle, the other one as a passenger car; in such cases, both vehicle versions have exactly the same front and there is absolutely no reason why the one would be exempted from the pedestrian protection requirements while the other would not be exempted.

In conclusion, OICA believes that there is no reason not to expand the exemption for flat front vehicles, proposed by GRSP, to category 1-1 vehicles as well.
