REGULATION No. 11
(Door latches and hinges)

Proposal for draft Supplement 1 to the 03 series of amendments to Regulation No. 11

Submitted by the expert from the International Organization of Motor Vehicle Manufacturers (OICA)

The text reproduced below was prepared by the expert from OICA in order to transpose the proposal of amendment to global technical regulation No. 1 into Regulation No. 11. It refers to...

/* In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance performance of vehicles with respect to passive safety. The present document is submitted in conformity with that mandate.

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ECE/TRANS/WP.29/AC.3/18 and it is based on a document without a symbol (informal document No. GRSP-42-17) distributed during the forty-second session of the Working Party on Passive Safety (GRSP). The modifications to the current text of Regulation No. 11 are marked in bold or strikethrough characters.

A. PROPOSAL

Paragraph 6.1.3., amend to read:

"6.1.3. Load Test Three (applicable only to back doors that open in a vertical direction)"

Paragraph 6.3.2.1., amend to read:

"6.3.2.1. Based on a determination by each Contracting Party or regional economic integration organization, the locking device may be a:
(a) child safety lock system, or
(b) lock release/engagement device located within the interior of the vehicle and readily accessible to the driver of the vehicle or an occupant seated adjacent to the door."

Annex 3

Paragraph 2.3., amend to read:

"2.3. Load Test Three (only for back doors that open in a vertical direction only)"

Figure 3-3, amend to read:

"Figure 3-3 - Door Latch – Tensile Testing Fixture for Load Test Three (only for back doors that open in a vertical direction only)"

Annex 4

Paragraph 2.3.3.5., amend to read:

"2.3.3.5. Vertical Setup 1. (Only for back doors that open in a vertical direction). Orient the door subsystem(s)…"

Paragraph 2.3.3.6., amend to read:

"2.3.3.6. Vertical Setup 2. (Only for back doors that open in a vertical direction). Orient the door subsystem(s)…"
Annex 5

Paragraph 1., amend to read:

"1. Purpose

These tests are conducted to determine the ability of the vehicle hinge system to withstand test loads:

- in the longitudinal and transversal directions and, in addition,
- for back doors that open in a vertical direction only, also the vertical direction, as shown in Figure 5.2"

Paragraph 2.1.3., amend to read:

"2.1.3. Vertical load test (only for back doors that open in a vertical direction)"

B. JUSTIFICATION

The above OICA proposal comes in addition to ECE/TRANS/WP.29/GRSP/2008/5, submitted by the EC, and aims at harmonizing Regulation No. 11 with the latest developments of gtr No. 1.

OICA supports this alignment and suggests the following additional clarifications.

The additional third load test in the orthogonal direction applies only to door latches and hinges of back doors that open in a vertical direction. FMVSS 206 has already transposed gtr No. 1 and this limited application is clearly taken into account (see § 4.1.2.1(d)(3) in FMVSS 206 - 72FR5399 dated on 06/Feb/2007). It is therefore proposed to clarify the various paragraphs where this third load test is referred to.

In addition, the vertical setup for the inertial test procedure (see Annex 4) applies only to door latches of back doors that open in a vertical direction. FMVSS 206 has already transposed the gtr No. 1 and this limited application is clearly taken into account (see §5.1.1.4 (b) (2) (ii) (E) and (F) in FMVSS206 - 72 FR 5399 dated 06/Feb/2007). It is therefore proposed to clarify this Regulation No. 11 as well.

As concerns paragraph 6.3.2.1. regarding rear side doors, Regulation No. 11 literally copied the corresponding text of gtr No. 1. The text of gtr 1 allows each Contracting Party / Regional Economic Organization to choose the type of locking device for rear side doors (i.e. child safety lock or lock release/engagement device), because no harmonised requirements could be found in developing gtr No. 1. This text was however erroneously transposed in the framework of the 1958 Agreement, resulting in a potentially non-harmonised situation within the 1958 Agreement. It is therefore proposed to correct this slight mistake and to ensure that both systems, considered to be of equivalent safety, are allowed.
Finally, the wording "up to 2,000 N per minute" aims at harmonizing Regulation No. 11 with the current text in FMVSS206. This rate of up to 2,000 N per minute however leads to an application time of a minimum of 4.5 minutes, which still is quite a long time. It is therefore proposed that the manufacturer should be allowed to request that the test is performed in a shorter time.

Finally, the issue of the load rate is addressed in ECE/TRANS/WP.29/GRSP/2008/5, submitted by the EC, proposing a rate of "up to 2,000 N per minute"; this aims at harmonizing Regulation No. 11 with the expected text of gtr 1, when aligned with the latest status of FMVSS 206.

This rate of up to 2,000 N per minute however leads to an application time of 4.5 minutes. OICA consequently suggests that, when the test is performed in a shorter time and all requirements are met, this test should be considered as valid.