

COMMENTS BY THE RUSSIAN FEDERATION
IN REGARDS TO THE DOCUMENT ECE/TRANS/WP.29/2009/100

The Russian Federation considers necessary to comment on the provisions of the document ECE/TRANS/WP.29/2009/100 submitted for adoption.

The paragraph 1.2. of the draft 02 series of amendments to the Regulation No.66 as submitted allows a possibility of the type approval of M₂ and M₃ category vehicles not included into the scope of the Regulation No.66 as stipulated by the paragraph 1.1. The Article 3 of the 1958 Geneva Agreement obliges to consider the duly type-approved vehicles to be in conformity with the national legislation of the Contracting Parties to the Agreement. In case when a vehicle is out of the scope of the Regulation No.66, more strict provisions than those of the Regulation No.66 can be established in regards to that vehicle at the national level. There is a doubt, whether it is necessary for the country in question to recognize the type approvals of the vehicles not covered by the scope of the Regulation No.66 issued on a voluntary basis according to the paragraph 1.2. of the Regulation No.66 with the 02 series of amendments.

Also one should notice that the Class B vehicles having a capacity of 9-16 passengers are not in the scope of the Regulation No.66. The mandatory requirements for the strength of the upper part of the superstructure of small capacity vehicles of Class B (irrespective of their capacity) are set in the Regulation No.52 (paragraph 5.4.), however the approvals on the basis of the Regulation No.52 are no longer granted (starting from 1st April 2008). Thus, in the UNECE Regulations a gap arose in regards to regulating the strength of the superstructure of Class B vehicles having a capacity from 9 to 16 passengers, which may result in appearance on the market of potentially dangerous vehicles (which bodies might be made, for example, of wood or any other fragile materials, due to the absence requirements to the strength). The experts of the Russian Federation at the GRSG sessions spoke against actual exception from the UNECE Regulations of the provisions for the strength of a body of the Class B buses with the capacity up to 16 passengers.

The Russian Federation considers necessary to restore in the UNECE Regulations in force the mandatory provisions in regards to the strength of the roof of the buses with the capacity of 9-16 passengers. One of the proposed solutions for this issue could be the introduction in the Regulation No.107 of the provisions for the Class B buses with a capacity of 9-16 passengers, which are similar to the provisions of the paragraph 5.4. of the Regulation No.52 (static roof loading). The efficiency of the proposed provisions has been verified for many years of application of the Regulation No.52, and the requirements themselves and the methods of proving compliance are well-known by both vehicle manufactures and the Technical Services. Introduction of those provisions into the Regulation No.107 actually means their automatic transfer from one Regulation to the other, which will not require from the manufactures introducing any change into bus design or production technology. Thus, no transitional period for the preparation for their implementation is required. Introduction of those instructions as the obligatory will allow not reducing already reached level of passive safety of the Class B buses with a capacity of 9-16 passengers. Other proposed solution could be the extension of the scope of the Regulation No.66 on all buses irrespective of their capacity (dynamic loading). Further those provisions can be developed by the results of research

connected with a choice of a kind of tests² (dynamic or static loading), place, direction and energy of impact, etc.

The Russian Federation proposes to transfer this document to the GRSG working group to continue activity on improvement of the Regulation No.66.
