

**Proposal for amendments to Regulation No. 107 and for the proposal of informal group SDWEE related to service doors, windows and emergency exits (ECE/TRANS/WP.29/GRSG/2012/15.)**

First of all: Hungary welcomes and supports the SDWEE-s proposal (in the preparation of which Hungary also participated), calling the attention of GRSG on further important improvements, as follows:

- 7.6.1.4. Delete the last sentence, and insert a new one: ~~Escape hatches can only count as one of the above mentioned number of emergency exits.~~ ***Breakable side wall emergency windows may be provided, but they shall not be counted in the minimum required number of emergency exits.***

**Justification:** the escape hatches are well usable, very effective emergency exits, when the vehicle is lying on its side (and the emergency side windows are unusable on both sides), their number should not be limited among the required emergency exits. The side windows are not necessary and the breakable are not usable as emergency exits. (Brief Power Point presentation will prove this statement).

- 7.6.1.5. In the second sentence, delete “not” to read:

The connecting passage between them shall ~~not~~ be considered as an exit.

**Justification:** If we accept the intercommunication staircase as an exit from the upper deck of a double deck vehicle, why should we refuse the connecting passage in articulated vehicles? This passage is much more usable exit than the staircase.

- 7.6.1.11. This modification relates to the SDWEE proposal:

- (a) The second sentence (in the bracket) shall be modified as follows:

(In the case of double-deck vehicles, these hatches shall be fitted in the upper deck roof ~~only~~ ***and in the lower deck gangway floor***)

**Justification:** In the case of the lower deck this hatch is very important emergency exit, when the bus is lying on its side. There is no rear window, the doors and side windows can not be used. This type of hatch is allowed in the regulation.

- (b) The sentence just after the table shall be modified as follows:

Except as provided in paragraph 7.6.12, hatches may also be fitted in the case of Class I and A vehicles, ***but these hatches shall not be counted among the required number of emergency exits.*** There shall be....

**Justification:** The city buses (Class I and A) do not roll over in the practice, therefore there is no need for the hatches. When the bus is standing on its wheels (or on its roof), the escape hatches are not usable for the passengers. It is impossible to climb up, to creep out, through the hatch and jump down from 3 m.

7.6.2.5. Two modifications are proposed:

- (a) The second sentence in the first paragraph shall be amended (or deleted!)

In the case of double-deck vehicles, this requirement shall apply only to the upper deck, *if the lower deck has an escape hatch in the gangway floor.*

**Justification:** If the vehicle is lying on its side, there is no other emergency exit for the lower deck passengers as the escape hatch in the gangway or the windscreen (In real accidents, the windscreen is very often used as emergency exit. It is cut by a battery operated hand tool)

- (b) Delete the newly inserted second paragraph.

~~In the case of Class I and A vehicles, this provision is fulfilled if an escape hatch is fitted; or, if paragraph 7.6.1.12 applies an additional exit to those specified in paragraph 7.6.1 is fitted on each side of the vehicle.~~

**Justification:** Class I and A vehicles do not need escape hatches, see above, they do not rollover in the practice.

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