

## **Comments from the United States on ECE/TRANS/WP.29/GRSP/2012/14**

1. The cited document proposes changes to the head form test procedure of GTR No. 9 on Pedestrian Protection. Specifically, the proposal would amend definitions for locating the point of measurement (i.e. measuring point, target point, and first contact point definitions) within the test zone, as well as amend the test zone boundaries in an attempt to clarify the adult and child Head Injury Criterion (HIC) zones. The proposed change also seeks to amend the leg form test procedure to align the leg form center plane with its measuring point in a manner similar to that for the head form.
2. To justify the changes, the proposal cites informal document GRSP-48-27, which outlined how interpretation of the test procedures contribute to the ambiguity in determining the proper measuring point. The International Organization of Vehicle Manufacturers (OICA) was asked during the May 2011 GRSP session to further clarify the problem and propose potential solutions.
3. The U.S. concerns regarding the proposal are:
  - (a) Paragraphs 3.20.1 and 3.20.2 amend the definition of “measuring point” from a 3D point of first contact to a 2D point of contact. In principle, we agree that the test procedure could benefit from clarification that would promote consistency in how the GTR requirements are enforced. However, the proposed amended method acts to narrow the area along the side edges of the hood where it is more difficult to comply with the requirements for many vehicles. Moreover, the method does not remove the possibility that multiple contact points can occur in test areas with different requirements. OICA has not provided us with any data on actual vehicles that show the current method to be unfeasible, and the extent to which the proposed method would solve any problems related to multiple contact points.

- (b) Paragraphs 7.1.1.3.3, 7.1.2.2, 7.3.3, and 7.4.3 are amended to require the testing lab to verify that the tests can be conducted with an appropriate level of accuracy. Laboratories cannot be made responsible for determining what the accuracy of a test should be. It is the equivalent of the laboratories regulating the industry rather than governments. Accuracy requirements must be included in the regulatory text so that manufacturers know the requirements they must meet.
  - (c) Paragraphs 7.3.2 is amended to require that measuring points remain the “primary” impact point, and that impacts do not glance off the measuring point and result in a higher impact outside of the testable area. These are not technical specifications and thus, unacceptable for a regulation. We believe that the entire acceleration time history during headform/legform-vehicle interaction should be taken into account. Further, OICA has presented no data to show that this amended language is necessary.
4. Until these concerns have been addressed by an evidence-based proposal, the United States cannot support changes to the impact test zone requirements in the GTR.
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