

## **Comments for the draft amendment to ECE Regulation No. 43 (TRANS/WP.29/GRSG/1999/12/Rev.1)**

**Transmitted by Expert from Japan**

### **Comments:**

Japan is basically in agreement with the content of TRANSAM9/GRSG/1 999/12/REV.1, but considers it necessary to make verification or amendment concerning the following points:

Annex 14, Insert new paragraph 6.1.3.3. to read:

"6.1.3.3. For sun roofs, the abrasion test is not required."

Annex 16, Insert new paragraph 6.1.3.3 to read:

"6.1.3.3. For sun roofs, the abrasion test is not required."

Annex21 paragraph 4.2.2.2. put 4.2.2.2. in parentheses:

"[4.2.2.2. Subject to the provisions of paragraph 4.2.1.1., the safety glazing, through which the driver's indirect field of vision, as defined in paragraph 2.18 of this regulation, is obtained by means of the interior rear view mirror and two external rear view mirrors, must have a regular light transmittance of at least 30 per cent]"

Annex 21 Paragraph 4.2.2.3., amend to read:

"In the case of plastic panes, the safety glazing shall bear the additional symbol A/L, B/L, C/L or X/L as defined in paragraph 5.5.5 or 5.5.7 of this regulation--7~0 ~\_ XIL-

Annex 21 Paragraph 4.2.3.3., amend to read:

"Where sun roofs are constituted of plastic panes, they shall bear one of the additional symbols, as defined in paragraph 5.5.5 or or 5.5.7 of this regulation---

## **Justification:**

### Annex 14 and Annex 16 new paragraph 6.1.3.3..

The regular light transmittance is not required for sun roofs because they are requisite neither for direct nor indirect driver's vision. Therefore, such glazing can be exempted from the abrasion resistance requirement in the same way as GRSG/1999/12

### Annex21 paragraph 4.2.2.2.

We understand an effect on promoting safety caused by regulating regular light transmittance of glazing concerning the driver's indirect vision obtained by means of the interior rear view mirror and two external rear view. However, we propose more further examination of "paragraph 4.2.2.2."

It is because that, when we take thought of future adoption of Reg.43 and taking into domestic regulation, we have to examine data of accidents and problems occurring on the visibility of interior rear view mirror or regular light transmittance of glazing concerning indirect vision obtained by interior and external mirrors, and to be able to explain the reasons why we have to regulate regular light transmittance of rear glazing, although, in Reg.43 and former domestic regulation, interior mirror is not requested for vehicles having two exterior rear view mirrors, and even trucks having no indirect view obtained by interior mirror because of their beds are to be no restricted for safety. And we think the basis of "30%" should be clarified.

In addition, with respect to the glazing concerning the driver's indirect vision obtained by means of the interior rear view mirror and two external rear view, a transmittance of approximately 20%, 30% or 50% is used in Japan. (The transmittances are expressed in approximate values, because they differ according to plane thickness.) , and these has not caused safety problems in particular.

### Annex21 paragraph42.2.3

firstly, in case of no head impact, C/L might be applicable. Secondary, 5.5.7 (rigid plastic double-glazed unit) is to be added in this provision equally to 5.5.5, because the possibility to use rigid plastic double-glazed unit for sun roof should be accepted to allow the unhindered development of new technologies.

### Paragraph 4.2.3.1

557(rigid plastic double-glazed unit) is to be added in this provision equally to 5.5.5, because the possibility to use rigid plastic double-glazed unit for sun roof should be accepted to allow the unhindered development of new technologies.

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