

**Comments on the B/UK PROPOSAL FOR DRAFT AMENDMENTS
TO REGULATION No. 43 (Safety glazing)**

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Transmitted by the expert from Germany

A The B/UK proposal

Beside others the proposal covers essentially new requirements concerning the installation of safety glazing in the area of indirect field of vision of motor vehicles and setting a regular light transmittance of at least [30] per cent (Annex 21, paragraphs 4.2.2.2. and 4.2.3.2.).

B Comments

This proposal as described under A above cannot be supported by Germany with the following rationale:

- The indirect field of vision of motor vehicles is regulated in ECE-R 46 (rear view mirror) and Directive 71/27/EEC respectively.

It is the intention to amend these regulations by increasing the indirect fields of vision to further improve safety.

A proposal to amend Dir. 71/127/EEC has been prepared in Germany and already handed over to the European Commission. This proposal might serve as a base document for the further development of ECE-R 46 as well.

- Glazing installed in the area of indirect fields of vision can be obscured by persons and goods to be transported in the rear compartment. Sun shields, advertising applicated on the glazing, rigid installations of walls in the interior might as well obscure the vision through these glazings. Foils applicated on the glazing will alter the transmittance of glazing.
- Several vehicle categories do not have glazing in the area of indirect fields of vision, i.e. trucks.

- There are no legal requirements known setting limits for the light transmittance of glazing in the indirect field of vision world wide.
- A partial reduction of light transmission is in the interest of safety to i.e. reduce the temperature load in the vehicle interior.
- Autochrome glazing does not adapt to a fixed light transmittance value.
- There is no statistical prove that the view through glazing in the indirect field of vision of certain categories of motor vehicles helps to improve safety significantly.

C Conclusions

- ECE-R 43 should not be amended according to the B/UK proposal concerning the light transmission of glazing in the area of indirect fields of vision.
- ECE-R 46 and Dir. 71/127/EEC concerning the indirect field of vision should be improved according to the state of the art.