PROPOSAL FOR AMENDMENTS TO REGULATION No. 94 (frontal collision)

Note: The text reproduced below was prepared by the expert from the Netherlands in order to include vehicles equipped with automatically activated door locking systems in the test procedure for Regulation No. 94.

The modifications to the existing text of Regulation No. 94 are marked in bold or strikethrough characters.

I. Proposal

Paragraph 2.15., amend to read:

"2.15. "Automatically activated door locking system" means a system that lock the doors automatically at a pre-set speed, when accelerating, after a specified time, when put into gear or due to any other means."

Paragraph 5.2.3., amend to read:

"5.2.3. During the test no door shall open;.

In case of automatically activated door locking systems which are optional and/or can be de-activated by the driver it shall be demonstrated to the satisfaction of the Technical Service that no door shall open in case of an impact without the system being present and/or activated."

Paragraph 5.2.4., amend to read:

"5.2.4. During the test no locking of the locking systems of the front doors shall occur:

For vehicles equipped with an automatically activated door locking system, the doors must be locked before the moment of impact and be unlocked after the impact when the vehicle has come to a complete standstill.

In case of automatically activated door locking systems which are optional and/or can be de-activated by the driver it shall be demonstrated to the satisfaction of the Technical Service that no locking of the locking systems of the doors shall occur in case of an impact without the system being present and/or activated."

Annex 3 - Paragraph 1.4.3.5., amend to read:

"1.4.3.5. Doors

The doors shall be closed but not locked.

For vehicles equipped with an automatically activated door locking system:

- 1.4.3.5.1. the system should be activated at the start of propelling the vehicle in order to lock the doors automatically before the moment of impact, or,
- 1.4.3.5.2. the doors shall be locked manually by means of the vehicle's central locking system before the start of propelling the vehicle.

This also applies to automatic door locking systems which are optional and/or which can be de-activated by the driver."

II. Justification

It has become common practise to equip vehicles with automatic door locking systems (also called 'rolling door locks', 'speed locks', 'auto locks', etc.). Regulation R94 however does not allow the doors being locked during the test. This contradicts with the fact that in real live, for vehicles equipped with automatic door locking systems, the doors are locked at the moment of impact.

Including requirements for automatic door locking systems gives the opportunity to demand these systems to automatically unlock the doors upon an impact in order to evacuate the occupants. Simultaneously the correct functioning of these systems can be checked.

Paragraph 5.2.4., "front" is deleted. There is no reason this should apply to front doors only.