

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 17
(Strength of seats)

OICA comments to
ECE/TRANS/WP.29/GRSP/2006/10, submitted by the expert from the Netherlands

A. PROPOSAL

Paragraphs 6.3.1. and 6.3.2., amend to read:

"6.3.1. A longitudinal horizontal deceleration or, **at the choice of the applicant**, acceleration of not less than 20 g shall be applied for 30 milliseconds in a direction to the whole shell of the vehicle imitating a frontal collision, in accordance with ...the requirements of Annex 7, paragraph 1. At the request of the manufacturer the test pulse described in Annex 9 - appendix, may be used alternatively.

6.3.2. A longitudinal deceleration or, **at the choice of the applicant**, acceleration in accordance with the requirements of paragraph 6.3.1. shall be applied imitating a rear collision."

Paragraph 7.2., amend to read:

"7.2. The competent authority which granted type approval may at any time verify the conformity control methods applied for each production unit. The authority may also carry out random checks on serially-manufactured vehicles in respect to the requirements set out in paragraph 5. above. **All tests shall be conducted under the same conditions as during the type approval.**"

Annex 9, paragraph 3.1., amend to read:

"3.1. The body of the passenger car shall be anchored securely to a test sled, and this anchorage shall not act as reinforcement for seat-backs and the partitioning system. After the installation of the test blocks as described in paragraph 2.1. or 2.2., the passenger car body shall be decelerated or, **at the choice of the applicant**, accelerated such that the curve remains within the area of the graph in Annex 9, Appendix, and the total velocity change ΔV is 50 +0/-2 km/h. With the agreement of the manufacturer, the above described test pulse corridor can be used alternatively to fulfil the test of the seat strength according to paragraph 6.3.1."

B. JUSTIFICATION

OICA fully supports the proposal ECE/TRANS/WP29/GRSP/2006/10 submitted by the Netherlands.

Some minor modifications are however suggested as follows:

- a) Paragraphs 6.3.1. and 6.3.2 and Annex 9, paragraph 3.1
As discussed during the December 05 GRSP session, it needs to be clarified that the choice between a deceleration or an acceleration sled test should remain with the applicant for approval. The proposed amendments to the proposal ECE/TRANS/WP29/GRSP/2006/10 are indicated in bold.

- b) Paragraph 7.2
As discussed during the December 05 GRSP session, tests any test at Conformity of Production should be conducted under the same conditions as those at the time of type approval. The proposed amendments to the existing text of UNECE R17 are indicated in bold.
