

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 80
(Strength of seats and their anchorages in buses)

OICA comments to
ECE/TRANS/WP.29/GRSP/2006/11, submitted by the expert from the Netherlands

A. PROPOSAL

Paragraph 8.3 (existing text – R80.01), amend to read

"8.3. The competent authority which has granted type approval may at any time verify the conformity control methods applicable to each production unit and carry out on samples any test deemed necessary among the tests carried out for the approval. **All tests shall be conducted under the same conditions as during the type approval.**"

Appendix 1, Paragraph 3.4.2, amend to read:

"3.4.2. The deceleration or, **at the choice of the applicant**, acceleration of the trolley during the impact simulation"

B. JUSTIFICATION

OICA fully supports the proposal ECE/TRANS/WP29/GRSP/2006/11 submitted by the Netherlands.

Some minor modifications are however suggested as follows:

- a) Paragraph 8.3
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 R80 (01 series of amendments) are indicated in bold.
- b) Appendix 1, Paragraph 3.4.2
As for other UNECE Regulations where the alternative use of an acceleration sled is being discussed, it needs to be clarified that the choice between a deceleration or an acceleration sled test should remain with the applicant for approval
