

**PROPOSAL FOR DRAFT AMENDMENTS TO DRAFT GLOBAL TECHNICAL
REGULATION (GTR) ON PEDESTRIAN SAFETY
(Proposal for draft amendments to ECE/TRANS/WP.29/GRSP/2006/7)**

Notes; the text reproduced below was prepared by the expert from Japan. The modifications to the text are marked in **bold** characters

A. PROPOSAL

Part A., STATEMENT OF TECHNICAL RATIONALE AND JUSTIFICATION,

Page 11, section V., paragraph (b), amend to read:

"(b) Applicability

Some delegates wanted to limit application of the gtr to vehicles in Category 1-1 with a vehicle mass of less than 2.5 tonnes GVM. Other delegates did not agree with a 2.5 tonnes limit on GVM, believing that since the front-end structure of vehicles with 3 or 3.5 tonnes GVM usually is similar to the lighter vehicles, the application of the gtr should include the heavier vehicles. In addition, some delegates sought to limit application of the gtr to vehicles of a GVM more than 500 kg, while other delegates expressed concern about having a lower mass limit, believing that a particular jurisdiction might determine there is a need to apply the gtr requirements in that jurisdiction to vehicles with a GVM less than 500 kg. There was a suggestion that the gtr should also apply to vehicles in Category 2 that had the "same" general structure and shape forward of the A-pillars as vehicles in Category 1-1.

~~However, some were concerned that it could be unfeasible to define objectively what was meant by "same".~~

After considering these issues, it was recommended that the gtr should be drafted to have a wide application to vehicles, to maximize the ability of jurisdictions to address effectively regional differences in pedestrian accident crash characteristics. The gtr would provide that if a jurisdiction determines that its domestic regulatory scheme is such that full applicability is inappropriate, it may limit domestic regulation to certain vehicle types, or may even impose only some of the gtr requirements to a particular vehicle type.

This approach was recommended because it maximizes the discretion of jurisdictions to decide whether vehicles should be excluded from the gtr for feasibility or practical reasons, or for lack of a safety need to regulate the vehicles. It was recognized that the front-end shape of the vehicle is an important factor affecting the kinematics of the pedestrian.

However, this approach recognizes that jurisdictions should make their own determinations as to whether the front-end shapes of vehicles in their region fall within the shape corridors upon which the gtr was developed. Niche vehicles that are unique to a jurisdiction could also be addressed specifically by that jurisdiction, without affecting the ability or need of other jurisdictions to regulate the vehicles. When a contracting party proposes to adopt the gtr into its domestic regulations, it is expected that the Contracting Party will provide reasonable justification concerning the application of the standard to the vehicle types.

AccordinglyAs a result, the gtr on pedestrian protection would apply to **following vehicles**,~~as follows.~~

- vehicles up to 2.5 tonnes~~all vehicles~~ in Category 1-1
- ~~and Category 1-2, and to all vehicles in Category 2,~~vehicles up to 3.5tonnes in Category 1-2 and in Category 2 whose front area (forward of the A-pillars) have the same shape and structure as vehicles up to 2.5 tonnes in Category1-1.-
- vehicles from 2.5 tonnes up to 3.5 tonnes in Category1-1 whose front area (forward of the A-pillars) have the same shape and structure as vehicles up to 2.5 tonnes in Category1-1.

A jurisdiction may restrict application of the requirements in its domestic regulation if the jurisdiction decides restricting application in its domestic regulation is appropriate."

B. Justification

Analysis of technical feasibility and cost effectiveness for vehicles up to 2.5 tonnes in Category 1-1 is conducted at GRSP/PS-WG. Therefore, the GRSP/INF/PS/WG has drafted the text on the GTR/PS for up to 2.5 tonnes vehicles in Category 1-1, based on IHRA/PS/WG results.

However, I believe that it is possible to apply the current data (already submitted data to GRSP or informal meeting) from the aspect of technical feasibility, if it is the vehicle whose front area (forward of the A-pillars) have the same shape and structure as vehicles up to 2.5 tonnes in Category1-1.

Comparison of gtr draft, US proposal and Japan proposal

Red check mark indicates additional proposal to original draft gtr without new data

			GTR original	US proposal	EC proposal (*)	Japan proposal
Category 1-1		Y	0. 5t<GVM≤2. 5t	✓	✓	✓
		N	2. 5t<GVM≤3. 5t	-	✓	-
Category 1-2	the same shape and structure as vehicles up to 2.5 tonnes in Category 1-1.	Y	0. 5t<GVM≤2. 5t	-	✓	✓
		N	2. 5t<GVM≤3. 5t	-	✓	-
Category 2		Y	0. 5t<GVM≤2. 5t	✓ (Derived)	✓	✓
		N	2. 5t<GVM≤3. 5t	-	✓	-

*)indicate unladen vehicle mass (not GVM)

***)including exceed 3.5t

N.new shape..Y.same shape up to 2.5 tonnes in category 1-1

What is the same shape and structure as vehicles in Category 1-1?

- The details of definition "shape and structure as vehicles in Category 1-1" isn't clear.
- As a idea, the definition is decided by each contracting party.
- For example, EC directive define this, as follows.

Vehicle type" means a category of vehicles which, forward of the A-pillars, do not differ in such essential respects as:

- the structure,
- the main dimensions,
- the materials of the outer surfaces of the vehicle,
- the component arrangement (external or internal),

in so far as they may be considered to have a negative effect on the results of the impact tests prescribed in Part II.