



**Questions by the TAAM delegation of the Netherlands  
RDW-TAAM-2011-007**

<b>Directive or Regulation number:</b>		
2001/85/EC and ECE regulation 107		
<b>Subject:</b>		
Buses and coaches		
<b>Reference to Annex, etc in the Directive or Regulation:</b>		
Annex 3, paragraph 7.7.1.8.		
<b>Text:</b>		
7.7.1.8.	However, one or more folding seat(s) for use by the crew may obstruct the access passage to a service door when in the position of use provided that:	
7.7.1.8.1.	...	
7.7.1.8.2.	...	
7.7.1.8.3.	the door is not considered to be a mandatory exit for the purpose of paragraph 7.6.1.4.,	
(For more relevant text, see annex)		
<b>Question:</b>		
Paragraph 7.7.1.8. of Annex 3 to ECE Regulation 107 permits under certain conditions that a folding crew seat obstructs the access passage to a service door. One of those conditions is that the door is not considered to be a mandatory exit for the purpose of paragraph 7.6.1.4. That paragraph prescribes the minimum required exits.		
The reference to paragraph 7.6.1.4. leads to different interpretations. One of them is that by just adding an emergency window the provision of this paragraph can be met without the service door and that obstruction of the access passage by the folding seat for the crew is permitted.		
The question is as follows: May the folding seat for the crew always obstruct the access passage to the service door when there are more exits than the minimum required by paragraph 7.6.1.4?		
<b>Solutions:</b>		
A	Yes, the present wording permits this	
B	No, this is not in line with the spirit of the regulation.	
<b>Decision:</b>		
<i>Solution</i>	<i>Accepted</i>	<i>Refused</i>
1A		X
1B	X	
<b>Authority:</b>		
Type approval Authority e/E	4	
<b>Remarks:</b>		



Annex 3 to Regulation 107

7.7. Interior arrangements

.....

7.7.1.8. However, one or more folding seat(s) for use by the crew may obstruct the access passage to a service door when in the position of use provided that:

7.7.1.8.1. ...

7.7.1.8.2. ...

7.7.1.8.3. the door is not considered to be a mandatory exit for the purpose of paragraph 7.6.1.4.,

7.7.1.8.4. ...

7.6.1. Number of exits

7.6.1.1. The minimum number of doors in a vehicle shall be two, either two service doors or one service door and one emergency door. Every double-deck vehicle shall have two doors on the lower deck (see also paragraph 7.6.2.2.). The minimum number of service doors required is as follows:

Number of passengers	Number of service doors		
	CLASS I & A	CLASS II	CLASS III & B
9 - 45	1	1	1
46 - 70	2	1	1
71 - 100	3	2	1
	(2 in the case of a double-deck vehicle)		
> 100	4	3	1

7.6.1.2. ...

7.6.1.3. ...

7.6.1.4. The minimum number of emergency exits shall be such that the total number of exits in a separate compartment is as follows:

Number of passengers and crew to be accommodated in each compartment	Minimum total number of exits
1 - 8	2
9 - 16	3
17 - 30	4
31 - 45	5
46 - 60	6
61 - 75	7
76 - 90	8
91 - 110	9
111 - 130	10
>130	11