

I. Comments on the proposed amendments to GTR No 9 in working document ECE/TRANS/WP.29/AC.3/31

Concerning the proposal to insert new paragraphs 3.30. and 3.31.:

"3.30. The measuring point for the headform test is a point in the vertical longitudinal plane of the vehicle, containing the centre of the impactor. In this plane, it is the point at which the impactor nominally first contacts the bonnet top (see point B in Figure 6A and Figure 6B). The first contact point may differ from the measuring point as a result of the geometry of the bonnet top."

[The measuring point is sometimes referred to as "test point" or "selected impact point" in respective regulatory texts for pedestrian protection.]

3.31. The measuring point for the lower legform to bumper test and upper legform to bumper test lies in a vertical longitudinal plane containing the central axis of the impactor. The first contact point may differ from the measuring point as a result of the geometry of the vehicle front."

It is not clear if these additions are indeed meant to be definitions. Furthermore, the text is not clear as a point in the vertical longitudinal plane of the vehicle is described. As the headform is aimed towards the rear of the vehicle in a downward direction and the legform only in a rearward direction, the only relevant planes are either the horizontal and/or transverse vertical planes.

Concerning the proposal to amend Paragraph 5.2.4.3.:

"5.2.4.3. The areas of "HIC1000 zone" and "HIC1700 zone" may consist of several parts, with the number of these parts not being limited. The determination of the impacted zone is done by the **measuring first contact point, irrespective of the position of the first contact point** ~~of the headform~~ with the "bonnet top"."

This is quite a departure from the original formal text and we would like to ensure that all Contracting Parties can agree to this proposed change.

II. Justification

1. The European Commission has raised concerns about this document during the 50th session of GRSP.
 2. The current text of 5.2.4.3. leads to a very clear situation without the need for further interpretation, however, this is not in line with current practise of manufacturers and technical services. The aim to modify this text is to align it with existing type-approval testing practises, however the implication on self-certification testing is not entirely clear.
 3. Provided that the relevant Contracting Parties can indeed support the proposal in general, the items which surely need to be addressed are those of the unclear definitions.
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