

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

Concerning the proposal to amend paragraphs 3.19. and 3.25., remove the square brackets.

Concerning the proposal to insert new paragraphs 3.30. and 3.31., replace these paragraphs with:

"3.30. "Measuring point" for the headform test means a point on the vehicle's outer surface selected to be tested. The central axis of the impactor and the measuring point are in a plane parallel to the vertical longitudinal median plane of the vehicle (see Figure 6A). The first contact point may differ from the measuring point as a result of the geometry of the bonnet top (see Figure 6B)."

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

3.31. "Measuring point" for the lower legform to bumper test and upper legform to bumper test means a point on the vehicle's outer surface selected to be tested. The central axis of the impactor and the measuring point are in a plane parallel to the vertical longitudinal median plane of the vehicle. The first contact point may differ from the measuring point as a result of the geometry of the vehicle front (see Figure 6C)."

Concerning the proposal to amend paragraphs 7.3.3., replace this paragraph with:

"7.3.3. The point or points of first contact of the **child headform impactor **during the test** shall be within ± 10 mm of the point or one of the points of first contact as determined before the test—tolerance to the selected impact point."**

Concerning the proposal to amend paragraphs 7.4.3., replace this paragraph with:

"7.4.3. The point or points of first contact of the **adult headform impactor **during the test** shall be within ± 10 mm of the point or one of the points of first contact as determined before the test—tolerance to the selected impact point."**

Concerning the proposal to amend paragraph 5.2.4.3., replace this paragraph with:

"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, independent of the first contact point of the headform **inside or outside of** with the "bonnet top test area"."**

II. Justification

1. The European Commission has raised concerns about working document ECE/TRANS/WP.29/AC.3/31 during the 50th session of GRSP, which have been further discussed during the 51st session.
 2. The proposal in this informal document is aimed to amend working document ECE/TRANS/WP.29/AC.3/31 and to reflect the outcome of discussions with OICA, The Netherlands, Japan, South Korea, USA, and the EC.
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