

Proposal for amendments to Regulation No. 107 (M₂ and M₃ vehicles)

I. Proposal

Annex 3, paragraph 7.6.8.2.1., amend to read:

"7.6.8.2.1. Be capable of being easily and instateously operated from inside ~~and from outside~~ the vehicle by means of a device recognised as satisfactory. This provision includes the possibility of using e.g. panes of laminated glass or plastic material, or "

II. Justification

1. On the last GRSG session the above paragraph was discussed, based on ECE/TRANS/WP.29/GRSG/2014/4 submitted by the expert from Hungary, and finally adopted by the working party. During the discussion, the deletion of these three words was also mentioned afterwards, but there was no concrete written proposal, therefore GRSG did not make a decision.

2. On the basis of the last discussion, the arguments supporting the deletion are listed below:

- (a) The requirement covered by these words is not a realistic provision, it is not used in the practice and there are not available technical solutions so far.
 - (b) It does not improve safety. If inside passengers, having instructions and driver's help, cannot open the emergency window, less likely a person from outside without any instruction would open it. In an emergency situation where firemen are needed, they will likely enter the bus without opening the device.
 - (c) Many buses and coaches are staying in parking lots or at end stations for long time. The driver locks and leaves the empty vehicle. Having the discussed outside opening device, thieves, homeless people, drugged people, etc. may enter the bus, which does not serve the safety. The reason that there are no this kind of examples is that in the practice there are no this kind of devices.
 - (d) The IG/SDWEE proposed to introduce the "overnight locking system" into Regulation No. 107, solving the problem mentioned above (the proposal was adapted by WP.29). Now we have two systems (devices) in a bus parallel: one, which locks the empty bus avoiding the unauthorized enter and on other which makes it possible.
 - (e) Thousands and thousands bus types are approved on the basis of Regulation No. 107 which do not have these outside opening devices. This is illegal situation, which should be stopped and avoided for the future.
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