

Proposal for amendments to ECE/TRANS/WP.29/GRSG/2018/24 (Proposal for a new UN Regulation on uniform provisions concerning the approval of motor vehicles with regard to the Blind Spot Information System for the Detection of Bicycles)

The text reproduced below was prepared by the expert from OICA to clarify the OICA position on the intended scope of the draft BSIS regulation.

I. Proposal

Paragraph 1.1., amend to read:

"1.1. This Regulation applies to the blind spot information system of vehicles of categories **N₂ > 8 t permissible maximum mass and N₃**. ~~[M2,] N2 [(> 8 t permissible maximum mass)] and [M3 and] N3."~~

II. Justifications

1. The proposal to include the vehicles of categories M2 and M3 appeared at the 6th session of the GRSG-VRU-Proxi informal group, i.e. very late in the process of drafting the regulation. It does not represent the consensus reached in the group.
2. Accidentology data (cfr. VRU-Proxi-06-06) shows low impact for M2 and M3, as well as for N2 below 8 tons.
3. Test procedure is not designed for M2/M3 categories and these categories were never in mind during the development of the test scenarii. Therefore, paragraph 6. "Test procedure" is not consistent with M category vehicles (vehicle sizes, driver position, wheelbase, front overhang, minimum turning radius etc.). For example, a bicycle at "Last Point of Information (LPI)" is visible from the front window for a typical M3 vehicle, such as (M3 Class I) city bus.
4. For some M category vehicles, the fitment of the information signal in the defined position (paragraph 5.4.2. "*the information signal shall be located at an horizontal angle greater than 30° towards an axis parallel to the longitudinal median plane of the vehicle and going through the ocular reference point*") is not possible. Examples are city busses for local transport, because:
 - a. Busses have signals and switches for door opening located in the designated area, which may then be confused with the BSIS signal.
 - b. In local busses which are fully occupied, standing passengers may obstruct the view of the driver to the BSIS signal.
5. Smaller M2 vehicles typically share their bodywork with vehicles categorized as M1. Installation of sensors and warning systems may interfere with conflicting requirements for M1 vehicles in these cases (e.g. obscuration angles of a-pillars if warning displays are to be mounted on those, function of a-pillar covers if vehicles are equipped with inflatable curtains). It is further unclear how and where to install appropriate sensor systems on the bodysides of such buses, that tend to be flat and sheet metal covered.
6. As confirmed in the discussion at VRU-Proxi-5th session: "Reaction time" = 1.4 seconds and "Driver Brake deceleration" = 5 m/s², which is the same braking deceleration as in UN Regulations Nos. 13 and 131 and applies to an applicable range of vehicles with a GVM greater than 8 tons.