
Proposal for changes to document GRSG/2020/21

Proposal for Supplement 2 to the 01 series of amendments to UN Regulation No. 125 (Forward field of vision of drivers)

Submitted by the experts of OICA

The text reproduced below was prepared by the experts from OICA. This proposal amends and supersedes the working document referenced ECE/TRANS/WP.29/GRSG/2020/31. The modifications to the current text of the regulation are marked in bold and strikethrough characters.

I. Proposal

Paragraph 1.1., amend to read:

“1.1. This Regulation applies to the 180° forward field of vision of drivers of category M₁ **and** N₁ vehicles.”

Paragraph 1.3., amend to read:

“1.3. The requirements of this Regulation are so worded as to apply to category M₁ **and** N₁ vehicles in which the driver is on the left. In category M₁ **and** N₁ vehicles in which the driver is on the right these requirements shall be applied by inverting the criteria, when appropriate.”

Insert a new Paragraph 2.19., to read:

“2.19. **"Partitioning System" means parts or devices which in addition to the seat backs, are intended to protect occupants from displaced luggage.**”

Paragraph 5.1.3., amend to read:

“5.1.3. Except as provided **by paragraph 5.1.3.5 and by either ~~the~~** paragraph 5.1.3.3. or 5.1.3.4. below, other than the obstructions created by the "A" pillars, the fixed or movable vent or side window division bars, outside radio aerials, devices for indirect vision, covering the mandatory field of indirect vision, and windscreen wipers, there shall be no obstruction in the driver's 180° forward direct field of vision below a horizontal plane passing through V1, and above three planes through V2, one being perpendicular to the plane X-Z and declining forward 4° below the horizontal, and the other two being perpendicular to the plane Y-Z and declining 4° below the horizontal (see Annex 4, appendix, figure 4).

...”

Insert a new Paragraph 5.1.3.5., to read:

“5.1.3.5. **For N1 vehicles, an ~~A~~ obstruction created by a partitioning system towards the passenger side will be tolerated if the partitioning system is adjustable and if the manufacturer demonstrates, to the satisfaction of the Technical Service and Type Approval Authority, through the use of documentation, simulation or any other**

* As defined in the Consolidated Resolution on the Construction of Vehicles (R.E.3.), document ECE/TRANS/WP.29/78/Rev.6, para. 2. - www.unece.org/trans/main/wp29/wp29wgs/wp29gen/wp29resolutions.html

means, that the partitioning system, in all of its positions of use defined by the manufacturer, does not significantly affect the driver's 180° forward direct field of vision."

II. Justification

1. EU Regulation (EU) 2018/858 Annex I Part A, Section 3 "Criteria for the categorization of vehicles in category N" includes specific requirements in paragraphs 3.2. to 3.4. on securing of load. In small N₁ vehicles these requirements are met by foldable/adjustable partitioning systems. The full application of UN Regulation No. 125 to this vehicle category will remove the possibility of such systems. A prohibition of such systems may lead some users to switch to larger vehicles.
2. The above proposal adds the definition of partitioning system as it is defined in UN Regulation No. 126 and an allowance for foldable/adjustable partitioning systems to partially obstruct the driver's field of view.
3. The new wording of paragraph 5.1.3. permits to clearly select which options are possible for complying with the provisions of the regulation.
4. The new wording of the proposed new paragraph 5.1.3.5. takes into account the comments received at the 118th session of GRSG (July 2020) and is the result of a collaborative consultation of all the parties that showed interest in this subject.