

Submitted by the expert from Japan

Informal document GRSP-68-31-Rev.1
68th GRSP, 7-11 December 2020
Agenda item 7

Japan's comment on GRSP/2020/12
regarding the test procedure for the height of head restraints
in the case of vehicles having a low roof construction

The 68th session of GRSP
7-11, December 2020

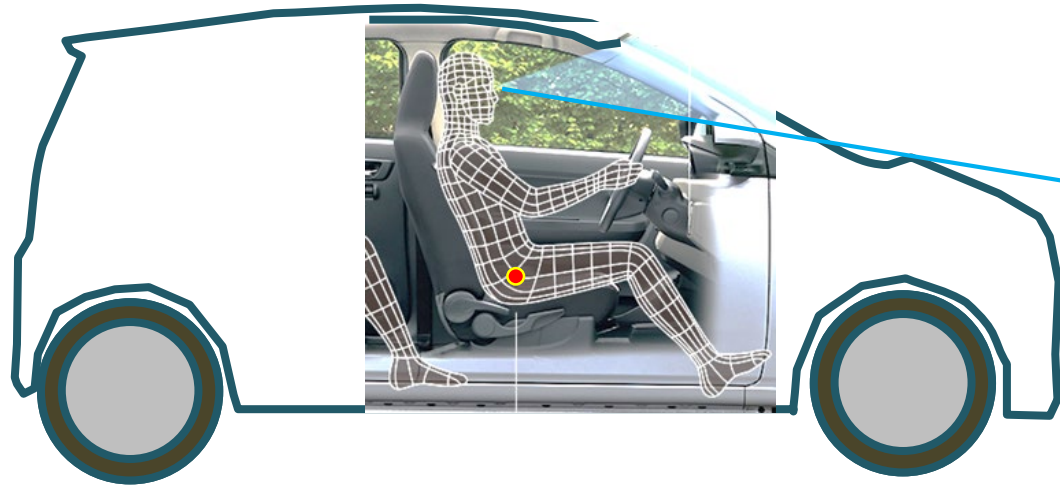


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These two factors should be taken into consideration among GRSP experts.

- **Range of exempted vehicles**: This exemption could be applicable to a wide range of passenger cars (not only sport-type cars).
- **Safety risk on tall occupants**: Risk of whiplash injury to taller occupants could increase due to unadjustability and small height of head restraint.

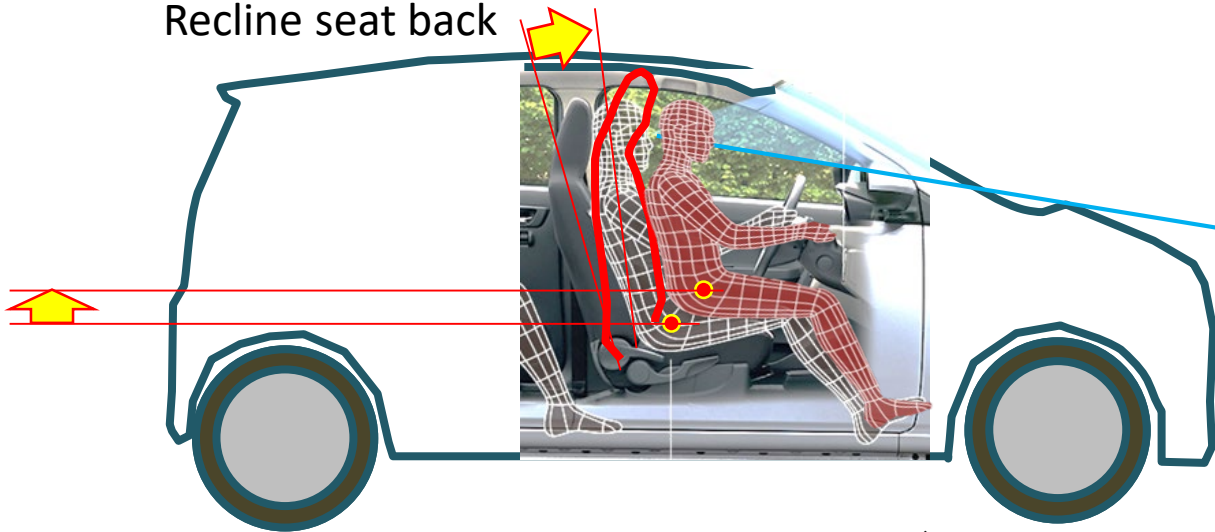
Example of small car



Design seating reference position (ex;50M)

Recline seat back

Seat lift up



Smaller seating ideal position (ex;5F)

Example of low roof sedan



Thank you!