

New UN Regulation on the direct visibility of pedestrians in front or to the side of the cab of a truck

Germany supports activities for the development of a new UN regulation on direct vision requirements in order to reduce the blind spots as far as possible.

It is a pity that innovative approaches that do not aim exclusively at direct vision requirements and have at least the same potential for accident prevention are not considered in the discussions. Actively intervening driver assistance systems that prevent moving off or brake automatically also work in situations in which the driver does not recognize dangerous situations despite sufficient visibility. According to the accident scenarios presented at IWG VRU-Proxy (see VRU-Proxy-18-03, slide 6), this is the main reason for these accidents. The lack of visibility comes with a clear margin.

Germany supports the approach that vehicles without the aforementioned assistance systems have higher requirements for direct vision than vehicles with corresponding systems.

In the IWG, the majority currently favoured a volume-based approach, which for different levels of ambition contain not only a minimum total volume but also separate minimum volumes in certain directions.

From a German point of view, the volume approach currently being discussed provides only a quantitative, but not a qualitative, assessment. With the same front volume, e.g. the average VRU detection distance to the front of the vehicle differs by around 20% for individual vehicles (see VRU-Proxy-19-10, slides 14 and 16). Furthermore, the width of the vehicle and the position of the A-pillars are decisive for the current approach for the front volume.

Therefore, Germany supports the approach of a minimum total volume without a separate minimum volume in individual directions, at least for vehicles with ambition level 3 that are not primarily developed and constructed for urban areas.

Germany advocates that actively intervening driver assistance systems and with regard to type approval and market surveillance authorities also simpler test methods are considered in future changes to the new UN regulation.