

## **Proposal to amend ECE/TRANS/WP.29/GRSG/2022/7**

### **Submitted by the experts of the IWG on VRU-Proxi**

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## **I. Proposal**

*Paragraph 5.3., amend to read:*

“5.3. ~~Up to 31 December 2024, for the purpose of type approval, the following applies.~~ If it can be demonstrated that...”

*Paragraph 6.2.2., amend to read:*

"6.2.2. The subject vehicle shall be assessed with the accelerator heel point positioned at a height from the ground that ~~represents~~ **is no lower than** the mid-point between the height that the manufacturer calculates it would be at for an unladen chassis cab (without body) and that which the manufacturer calculates it would be at when the vehicle is loaded to its technically permissible design maximum.”

## **II. Justification**

### **Paragraph 5.3**

It is deemed more appropriate and in accordance with the General Guidelines for United Nations regulatory procedures and transitional provisions in UN Regulations, to address this time limitation in the Terms of Reference that is also subject to the agreement of GRSG and that will give clarity on the agreed deliverables.

### **Paragraph 6.2.2.**

Large vehicles have high complexities relating to wheel-base, axle types, upper bodies, powertrains, etc.. and all variants have different ride-height reactions to load distributions. Establishing the exact mid-point may therefore be very complex, additionally such “mid-point” may not exist as physical variant. To avoid or mitigate this complexity it should therefore be allowed to base the certificate on a higher riding variant, assuming this represents a worse case than the mid-point.