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Proposal for a draft Corrigendum to Regulation No. 46

(Corrections to ECE/TRANS/WP.29/2006/101)

Note: The text reproduced below was prepared by the expert from the Netherlands in order to suggest corrections to ECE/TRANS/WP.29/2006/101, based on ECE/TRANS/WP.29/GRSG/2006/13, and to be considered by WP.29/AC.1 at their November 2006 sessions. The modifications to ECE/TRANS/WP.29/2006/101 are marked in **bold** or strikethrough characters.

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A. PROPOSAL
The list of contents, the Annexes, amend to read:
" Annex 10 - Calculation of the detection distance
Annex 11 - Determination of the ocular points for a seat with a fixed seat-back angle other than 25 degrees"
Paragraph 12.1., amend to read:
" as defined in Annex 8. In the case of a seat with fixed a seat-back angle other than 25 degrees, the location of the ocular points shall be adjusted in accordance with the provisions of Annex 11 to this Regulation. The straight line "
<u>Insert a new Annex 11</u> , to read:
"A.m. ov. 11

"<u>Annex 11</u>

DETERMINATION OF THE OCULAR POINTS FOR A SEAT WITH A FIXED SEAT-BACK ANGLE **OTHER THAN 25 DEGREES**

1. The position of the ocular points as defined in paragraph 12.1. of this Regulation in relation to the R point shall be adjusted as indicated in the table below by X and Z coordinates from the three-dimensional reference system. The table indicates the basic coordinates for a fixed seatback angle of 25 degrees. The three-dimensional reference system for the coordinates is as defined in Annex 8, Appendix 2 to this Regulation.

Seat back angle	Horizontal coordinates
(in degrees)	∆X
25	68 mm

2. Further correction for fixed seat-back angles other than 25 degrees.

The table below indicates the further corrections, from the ocular position with a fixed seat back angle of 25 degrees, to be made to the X and Z coordinates of the ocular points when the design seat back angle is not 25 degrees.

Seat-back angle	Horizontal coordinates	Vertical coordinates
(in degrees)	ΔΧ	ΔZ
5	-186 mm	28 mm
6	-177 mm	27 mm
7	-167 mm	27 mm
8	-157 mm	27 mm
9	-147 mm	26 mm
10	-137 mm	25 mm
11	-128 mm	24 mm
12	-118 mm	23 mm
13	-109 mm	22 mm
14	-99 mm	21 mm
15	-90 mm	20 mm
16	-81 mm	18 mm
17	-72 mm	17 mm
18	-62 mm	15 mm
19	-53 mm	13 mm
20	-44 mm	11 mm
21	-35 mm	9 mm
22	-26 mm	7 mm
23	-18 mm	5 mm
24	-9 mm	3 mm
25	0 mm	0 mm
26	9 mm	-3 mm
27	17 mm	-5 mm
28	26 mm	-8 mm
29	34 mm	-11 mm
30	43 mm	-14 mm
31	51 mm	-18 mm
32	59 mm	-21 mm
33	67 mm	-24 mm
34	76 mm	-28 mm
35	84 mm	-32 mm
36	92 mm	-35 mm
37	100 mm	-39 mm
38	108 mm	-43 mm
39	115 mm	-48 mm
40	123 mm	-52 mm

B. **JUSTIFICATION**

Document ECE/TRANS/WP.29/2006/101, that is based on document ECE/TRANS/WP.29/GRSG/2006/13, amends Regulation No. 46 on devices for indirect vision with regard to:

- an adjustment of the driver's ocular points for seats with a fixed seat-back angle;- the introduction of the wide angle mirror for some vehicle categories.

The Netherlands have some doubts about the amendments for the first topic.

The way the proposal for paragraph 12.1 is formulated now the driver's ocular points have to be corrected as prescribed in the new Annex 11 for seats with a fixed seat-back angle only. This correction doesn't have to be applied in case of a seat with an adjustable seat-back angle. The proposed correction exists of two parts, being a general one of 68 mm as given in the first table of Annex 11 and another one depending on the angle of the seat-back.

This will lead to the odd situation that, where a manufacturer wants to use seats with a fixed seat-back angle and seats with an adjustable seat-back within one vehicle type, different ocular points have to be used. We do not understand why this distinction in ocular points is needed. Such a different approach would neither be in line with the procedures for determining the V points in the draft UN/ECE-Regulation on the forward field of vision of the driver (TRANS/WP.29/2005/82) where a correction of the V points has to be applied to all seats with a design seat-back angle other than 25 degrees irrespective of the kind of seat-back adjustment. We believe that it is most logical to apply the correction as given in Annex 11 for all type of seats with a design torso angle other than 25°.

In addition to that, the driver's ocular points are clearly defined in paragraph 12.1. of the Regulation No. 46.02 as being points 635 mm vertical above the R-point. These ocular points are different points than the V-points of the draft Regulation on the forward field of vision. In our opinion the correction of 68 mm of the first table of proposal (ECE/TRANS/WP.29/2006/101) should not be applied at all in Regulation No. 46.02.

<u>Final conclusion</u>: We believe that the adjustment of the driver's ocular points should be applied to all type of seats with a design torso angle other than 25° and be limited to the values as given in the second table of the proposal. The proposal as presented to WP.29 for its meeting in November 2006 should be corrected as proposed above.

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