

Transmitted by the expert from Russian Federation

Informal document No. GRSG-97-07
(97th GRSG, 20 – 23 October 2009
agenda item 3(a))

ENGLISH
Original: RUSSIAN

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No.107
(M2 AND M3 CATEGORY VEHICLES)
WITH REGARDS TO THE OBLIGATORY SYNCHRONIZED OPERATION
OF THE RETRACTABLE STEPS AND THE DOORS

A. BACKGROUND

The Russian text of paragraph 7.6.10.1. of Annex 3 to Regulation No.107 contains the provision concerning the obligatory synchronized operation of the retractable steps and the doors (“They shall be duly retracted and extended simultaneously with closing and opening of the corresponding service or emergency door”), which formally does not correspond with the English text of that paragraph which does not contain any obligatory provisions concerning the synchronized operation of the doors and the retractable steps (“the operation of retractable steps may be synchronized with that of the corresponding service or emergency door”).

Regulation No.36 prescribes that the doors and any retractable steps shall operate synchronously (paragraph 5.6.10.1.: “Their operation shall be synchronized with that of the corresponding service or emergency door”).

Regulation No.52 prescribes that the doors and the retractable steps shall operate synchronously only if the retractable steps are power-operated (paragraph 5.6.10.1.: “If power-operated, their operation shall be synchronized with that of the corresponding service or emergency door”).

Note: According to Directive 2001/85/EC the synchronous operation the doors and the retractable steps is not obligatory (paragraph 7.6.10.1.: “the operation of retractable steps may be synchronized with that of the corresponding service or emergency door”).

Thus, in the process of evolution of the general provisions for bus safety (from Regulations Nos. 36 and 52 to Directive 2001/85/EC and then to Regulation No.107) the requirement concerning the obligatory synchronized operation of the retractable steps and the doors had disappeared (at least in the English version of Regulation No.107).

The question to the experts is as follows: as the danger for passengers to be injured while the retractable steps are in operation still exists, would the esteemed experts consider it necessary to restore the related provision in Regulation No.107?

B. PROPOSAL

The Russian Federation experts have five options of proposals for the above-mentioned issue (listed in the priority order):

Option 1: to include the corresponding amendments to Regulation No.107 basing on Regulation No.52, namely, synchronized operation of the doors and the retractable steps shall be provided only if they are power-operated (since the steps operated manually are practically safe):

Annex 3, paragraph 7.6.10.1., amend to read:

“7.6.10.1. If power operated, their operation shall be synchronized with that of the corresponding service or emergency door;”

Option 2 (having a less priority since involves complication of the design of the step actuator): to limit the forces of the extending steps which may affect a passenger analogously to the supplemental provisions for power-operated doors and ramps (see paragraphs 7.6.5.6.1.1. of Annex 3 and 3.11.4.3.3. of Annex 8 to Regulation No.107). The values of the reactive forces in this case may be determined according to the guidelines given in Annex 6 to Regulation No.107.

Option 3: to introduce a provision into Regulation No.107, according to which the power-operated step shall not be extended after the door opens and it shall not be retracted before the door closes):

Annex 3, paragraph 7.6.10.1., amend to read:

“7.6.10.1. the power-operated retractable step shall not be extended after opening and shall not be retracted before closing of the corresponding service or emergency door;”

Option 4: to bring the Russian text of paragraph 7.6.10.1. of Annex 3 in accordance with the English text:

Annex 3, paragraph 7.6.10.1. (the Russian text only), amend to read:

“7.6.10.1. ~~они должны надлежащим образом убираться и выдвигаться~~ работа убирающихся ступенек может быть синхронизирована одновременно с закрытием и открыванием соответствующей служебной или запасной двери;”

Option 5: as the English version of paragraph 7.6.10.1. of Annex 3 contains no an obligatory provision and, in fact, may be considered as a recommendation, maybe should this paragraph be deleted from Regulation No.107-02?
