Regulation No. 11 (Door latches and hinges) Proposal for Supplement 4 to the 03 series of amendments

I. Introduction

At the May 20143 GRSP session, the representative of Germany submitted informal document GRSP-53-12 which was later published as official document ECE/TRANS/WP.29/GRSP/2013/16. This proposal by Germany amends UN Regulation 11 to address "full-locking systems", allowing these under certain conditions only.

After detailed study, OICA has prepared the following counterproposal for review by GRSP.

II. Proposal

Paragraph 2.7., amend to read:

"2.7 Additional protections"

Paragraph 2.7., renumber as paragraph 2.7.1

Insert a new paragraph 2.7.2., to read:

"2.7.2 "Full locking system" is a system that overrides the interior and exterior controls of any locking device and renders them inoperable other than by operation of the vehicle's key."

Paragraph 6.3.1., amend to read:

"6.3.1. Each door shall be equipped with at least one locking device which, when engaged, shall prevent operation of the exterior door handle or other exterior latch release control and which has an operating means and a lock release/engagement device located within the interior of the vehicle.

The lock release/engagement device within the interior of the vehicle for the front door(s) may never be overridden by an additional locking feature, when the ignition is in the engine running mode."

Insert a new paragraph 6.3.1.1., to read:

- "6.3.1.1 Each door may be equipped with a full locking system, which when engaged prevents the interior door release handle or interior latch release control from operating. A full locking system may only be activated when the ignition is not in the engine running mode and must be installed in combination with at least one of the following safety measures:
 - a) Anti-theft alarm system with interior motion detection in accordance with UN R116 or UN R97, or any other equipment for detecting occupants within the interior compartment, such that initial setting of the full locking system is prevented if a person is detected within the passenger compartment.
 - b) Activating the full locking system by an additional deliberate user action.
 - c) A "setting time" of at least [40 sec] after the full locking system request

d) The vehicle is equipped with an operating means which allows any occupant in the vehicle to exit the vehicle at all time. "

II. Justification

For more than 25 years, vehicles have been supplied with "full locking" (also known as "double locking") systems and have been approved on the basis of UN R11 or equivalent rules. The theft numbers have continued to decrease from the mid 1990's. This "full locking" function is a key factor among other things in achieving such a huge reduction in car theft and should therefore not be removed.

Considering this long period of full lock implementation, the number of reported cases of unintentional "full locking" of occupants is extremely small. OICA however understands that concerns exist as to the possibility, even if rather remote, of "full-locking" occupants and therefore agrees that some additional safety measures may have to be defined.

This proposal, with the new suggested requirements under 6.3.1.1, aims at ensuring that no person(s) would be unintentionally "full locked" inside a locked vehicle, however any amendment must also take into account the requirement and expectation of the customer to have a secure vehicle