**IMMA comments on the USA's proposal for a harmonised layout for GTRs**

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IMMA recognises the intent behind the USA's proposal, as well as the fact that there are many possible layouts, which might be adopted for GTRs. IMMA is, however concerned that insisting on one format may make it difficult to write the text for some GTRs in a way which would make them easy to use. IMMA therefore submits the following proposals as a contribution to the debate.

IMMA considers that there are some topics, which are more suitably dealt with in the format proposed by the USA, for example, the installation of lighting, where the individual requirements are variations on a common theme.

For other topics, the items to be tested are different and there are therefore procedures and conditions which are specific to the item under test, for example brake testing. It would be a matter of judgement in the relevant group of experts as to which model of layout is most appropriate.

The two alternative schemas are shown below. At a more detailed level it would be possible to ask that the sub-sections within each item should follow a consistent order, e.g. the sequence in which sub-categories of vehicles are dealt with in the text.

The USA's original proposal:

1. Scope and Purpose
2. Application to vehicle categories
3. Definitions
4. General requirements
5. Performance requirements:
   - Item A
   - Item B
   - etc
6. Test conditions:
   - Item A
   - Item B
   - etc
7. Test procedures
   - Item A
   - Item B
   - etc
8. Annex

IMMA's proposal for an additional format

1. Scope and Purpose
2. Application to vehicle categories
3. Definitions
4. General requirements
5. Item A
   - Performance requirements
   - Test conditions
   - Test procedures
6. Item B
   - Performance requirements
   - Test conditions
   - Test procedures
7. Item C
   - Performance requirements
   - Test conditions
   - Test procedures
8. etc
9. Annex

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