

Table of each comment and proposal response

General

CT inf2-6 paragraph	Base document and paragraph	Content of comment	Country and document	Proposed revision by the country	Japanese response and justification	Discussion and decision in Ottawa meeting
Title	CT inf2-2	Change the title of GTR	Hungary Inf2-7	The title of a regulation shall refer to its main idea (content, goal, etc) The original title does not do that.	We would like to leave the title as it is. Currently the scope is limited to the Category, Weight and Dimension, and when necessary something else could be added. We, however, could add a sentence explaining why this regulation contains, at this moment, category, mass and dimension only.	Keep title as it is, but add a sentence on the front page explaining the intention of the document (para 2.4 can be used a basis for such phrase)
1.1	CT3-8 1.1	Scope: limited to engine-powered vehicles	Japan	Will be brought in line with GTR; if future expansion of scope (to include trailers, etc.) is considered, original draft should remain unchanged. However, usage of uppercase letters and lowercase letters must be revised.	revise draft	Agreed
2.1	CT inf2-2 2.1	It is suggested to keep the possibility to use different definitions in a GTR than those of GTR "O". For that reason we suggest to amend para. 2.1	Netherlands Inf2-8	When applying or interpreting the provisions of any GTR, Contracting Parties to the 1998 Agreement shall, <u>unless other provided in a GTR</u> , apply or interpret that GTR in accordance with the provisions of this Regulation.	We have no objection to use different definitions in a GTR for subdivision, however, it is necessary to consider the expressions to avoid any controversy in those definitions.	Agreed; already covered by paragraph 2.3. No change necessary.
2.3 2.4	CT3-8 2.3 2.4	Regarding reference of this provision: should → shall	Hungary Inf2-5		revise draft. Supported.	Agreed: use "shall"
2.4	CT inf2-2 2.4	Add a new sentence to the existing text:	Hungary Inf2-7	"The proposal shall be initiated by the GRs of WP29 and the adoption shall be made by WP29."	We understand that the procedure of making regulation should not be within the text of a regulation. This Regulation 0 is one of the GTRs, which means it will follow the procedure currently argued and to be decided in WP29/AC3. Since this is not the issue of technical field, consultation to the experts of legal affairs could be recommended at the stage of legal documentation.	Leave the text as it is. Responsibility of WP29.

Annex1 Categorization of vehicle

1.2.2	CT3-8 Annex1 1.2.2	more than (8)	OICA	8 people	Will revise draft; will delete parentheses. <i>Justification:</i> Harmonization with 1958 Agreement.	Agreed to remove brackets, as in real life 9 seats vehicles hardly exist (in US, Jpn)
1.2.2	CT3-8 Annex1 1.2.2	“Passenger” will be used, not “seat”, in order to define passengers.	Hungary Inf2-5		Original draft will remain unchanged; “seat” will be adopted. Original draft text is okay. <i>Justification:</i> Should be based on design construction.	Agreed to use “seating position”
1.2 1.3	CT3-8 Annex1 1.2 1.3	Category name 1,2,3	Japan		Original draft will remain unchanged. We have no ideas regarding this; if someone has a good plan, please present it as an official statement. Shouldn't the image of “passenger goods” be maintained? (OICA) <i>Justification:</i> With the use of numbers, the intent will not be readily known.	Agreed to ask all CT members in next meeting whether they prefer numbers or abbreviations
1.3	CT3-8 Annex1 1.3	Suggestion for deletion of “Sub paragraph”	Hungary Inf2-5		Original draft will remain unchanged. Judgment will be withheld. Original draft text is okay. <i>Justification:</i> Problem in the past; clarification of trailer-related definitions is necessary.	To be read in conjunction with comment 1.4. Agreed not to create a specific “Special purpose vehicle” category. The issue can be solved by classifying such vehicle in category 2 and/or to use national requirements. Move para 1.4 to the end, before para 2.
1.4	CT3-8 Annex1 1.4	Addition of “special purpose vehicle”	Hungary Inf2-5		“Definition of Special Purpose Vehicle” and “The construction and application of special purpose vehicles shall be determined by each country” will be added as Par. 1.4. Rejected. <i>Justification:</i> This is a problem that cannot be solved by establishing a new category, which would only confuse matters.	

1.3.2	CT3-8 Annex1 1.3.2	Establishment of intermediate payload class (GVM7.5t/8t)	Japan	Suitability of EU 7.5 ton and 8.0 ton classes	Parentheses will be removed and 7.5t class will be established. Middle size good vehicle (7.5t) is established by request of each countries and industry.	Agreed to retain all the subcategories on which the countries insist, but start with the 3 proposed subcategories. OICA is requested to study and to present their position in the next CT meeting. EU Comment to be studied further
1.5	CT3-8 Annex1 1.5	Deletion of "CATEGORY OF VEHICLES ON THE BORDER BETWEEN CATEGORY 1 AND CATEGORY 2"	Hungary Inf2-5		Original draft will remain unchanged. Rejected. <i>Justification:</i> Category is necessary.	Hungary suggestion accepted. Title was already deleted in document CT2-6
1.5	CT inf2-2 Annex1 1.5	Modify Annex1, 1.5	France Inf2-13	"If the intended principal function of a vehicle is on the border between category 1 vehicle and category 2 vehicle, to determine whether a vehicle is to be regarded as a category 1 vehicle or a category 2 vehicle for the application of GTRs, the following steps should be followed:"	This comment is acceptable.	Comment rejected, as it is not enforceable in practice: who will define what is the "intended principal function" of a vehicle, where is the "border"? France is invited to point out what would be the problem. Renumber the whole 1.5 into 1.4.
1.5.1	CT inf2-2 Annex1 1.5.1	Modify Annex1, 1.5	France Inf2-13	If the residual payload exceeds the passenger mass and if the number of seating positions in addition to the driver's seat does not exceed six, the vehicle shall be deemed to be a category 2 vehicle."	This comment is acceptable. <i>Justification:</i> In reality, it is rare case that the vehicles with more than seven passengers are considered as category 2 vehicles.	Comment agreed, on condition that the number of "6" is changed into "8", in order to avoid that such big vehicles can be classified as Category 1-1 vehicle.
1.5.1.2	CT3-12 2.4.2	Payload, passenger mass	Canada Inf2-4	Passenger mass → Passenger load The term "passenger mass" is not familiar, requires study regarding conformity with SI unit system.	Original draft will remain unchanged.	Agreed to keep "mass", as it is the correct SI Unit.
1.5.1.2	CT3-8 1.5.1.2	Definition of "passenger mass" is duplicated in Annex 2 Par. 5.2.	Japan		Expression will be changed to "total passenger mass excluding the driver." Will the definitions be integrated into one?	Agreed and also to move 1.5.1.1 and 1.5.1.2 to the annex on masses. 1.5.1.3 will be moved to a newly added annex with "general definitions" Note that the format needs to be amended to follow the format for

						GTR as agreed by WP29 in dkt 20125
1.5.1.3		Definition of “seating position”	US	Avoid that a bench that can seat 3 is declared as being able to carry only 2		Agreed that OICA will study FMVSS 571.3 and use this as basis for a definition on “seating position”. NHTSA supports
-	CT3-8 1.6– 1.6.2.4	Deletion of off-road requirement	Japan	Will be entrusted to government-side decision; when adopted, however, there should be no divergence from the 1958 Agreement. (Regulation 0 proposed by OICA)	Response will be considered when a proposal from another government is submitted.	Agreed
1.5	CT3-8 Annex1 1.5	Wouldn't a mathematical formula be clearer than a verbal explanation?	Japan	Faithfully expressed, a formula would probably be no problem; however, we would like to add an initial expression. “where it is not immediately apparent that a vehicle falls within category 1 or category 2, to determine”	Original draft will remain unchanged.	Agreed, but OICA will study a formula
	CT inf2-2	Add a new sentence to the existing text:	Hungary Inf2-7	“Category 3 vehicle: Special purpose vehicle means vehicle with four or more wheels which is not belonging to category 1 and category 2, designed and used for special functions, other than transporting people and goods, therefore it has special body arrangement and/or equipments.”	Under the provision 1.5.2, all the special purpose vehicles will belong to either of the Category 1 or 2. There is little necessity to add a new Category 3. Furthermore, if Category 3 is demanded in the future, the necessary amendment shall be made in paragraph 1.5.2 and then the new Category could be newly added. (It is already agreed at the 2 nd CT meeting, to form a minimum definition as referred in Para. 3 in CT2-4 “General Guidelines and procedures for developing definitions of Vehicle Category, Masses and Dimensions”*) As for the fundamental discussion whether the special purpose vehicle of more regional characteristics should be included in the harmonization activities, we would like to discuss it over at the next CT meeting. If you are in the position that such vehicles should be also included, opinions and the reasons are appreciated in advance to the meeting.	Already covered
1.5	CT inf2-2 1.5	Delete the title of this paragraph	Hungary Inf2-7	Delete the title of this paragraph (the first two lines written with capitals) The paragraph shall be the remaining three lines	Deletion of the title is acceptable.	Already covered: deleted
1.5.1	CT inf2-2 1.5.1	Delete the word “residual”	Hungary	Add after the words “passenger mass” the following sub sentence: “counted on the basis of seating positions”... and finish the	In one aspect the word “residual” could be used here for the purpose of expressing the significance of calculation, however, it is true that the definition is in Annex 2, para. 6, so we agree	Keep “Residual” Delete last line: Passenger mass counted on the basis of seating

			In2-7	paragraph with the existing text..	with your proposal. Adding the text of “counted on basis of seating position” is also accepted.	position
1.5.1.1	CT inf2-2 1.5.1.1	Delete	Hungary In2-7		We would like to leave the draft as it is, and to discuss how to sort this out at the next meeting, because practically it is easier to refer the paragraph in reach.	Keep the paragraph
1.5.1.2	CT inf2-2 1.5.1.2	Delete	Hungary In2-7		In the Annex 2 para. 5.2 simply defines the mass per person. The provision for total is necessary.	Already discussed. Change “Seat” into “Seating position” throughout the text
1.6	CT inf2-2 1.6	new paragraph	Hungary In2-7	“Further subcategories of vehicles shall be defined in the Appendix of this Annex 1, considering para. 2.4. in the general requirements of this regulation”	As for the definition of subcategories, we would like to discuss it at the next meeting whether it should be included in this issue of draft Reg. No. 0. (Note: See * above in the Annex 1 ad 1.4, too)	Covered by Para 2.4: concerns updating of the GTR “0”

Annex 2 Mass

Annex 2	CT Inf2-2 Annex 2	Addition to definition of GTM and CGM	France In2-13	The definitions of Gross Train Mass (GTM) and Combined Gross Mass should not be deleted from Annex 2. The application of global technical regulations to the different categories of vehicles as defined in Annex 1 may need the use of the different definitions of Annex 2, depending on the context. Besides, the definition of GTM is referred to in the definition of the Maximum Towable Mass and should be present in the text of Annex 2.	This should be discussed at the Ottawa meeting. Possible amendment is as follows; As for the concept of GTM, it is better to amend para. 10 as below than to revise para. 7. 'Gross Train Mass' means permitted value of the sum of the towing and towable vehicles as defined by manufacturer of motor vehicles.	Delete para 10 and the second sentence of para 7 where reference is made to GTM. OICA will study further
2.4	CT inf2-2 2.4	new paragraph	Hungary In2-7	“In case of special purpose vehicle beyond the requirements described in para 2.1. – 2.3. all the special tools, equipments, devices shall be considered which are needed to the normal work (duty) of the vehicle.	The special purpose vehicles are recognized as necessary equipment, however, it is doubted that its definition needs to be clarified here. We would like to discuss it at the next meeting. (Note: See * above in the Annex 1 ad 1.4, too)	Agreed that this is the responsibility of national authorities as pointed out in Annex 1
3.2	CT3-8 4.2	Deletion of definition of “incomplete vehicle”	Japan		The original will be left unchanged, since Pars. 4.1 and 4.2 will be changed to 3.1 and 3.2.	Agreed to keep the definition

	4.3				We would like to leave the definition in the text. <i>Justification:</i> It would clarify the item's positioning in the GTR.	
3.2	CT inf2-2 3.2	Can be deleted from this para	Netherlands Inf2-8	As the definition of "unladen mass" already includes the liquids, tools, spare wheel and can be deleted from para. 3.2. Furthermore we wonder if the second sentence was related to the deleted text of para. 3.1 and if this sentence is still necessary.	This comment is acceptable.	Agreed, also delete "if fitted"
3.2	CT inf2-2 3.2	new paragraph instead of the deleted one	Hungary Inf2-7	"In respect of a special purpose vehicle, beyond the driver all the technical crew shall be included which have seating position on the vehicle when it is moving to its working place."	Currently Incomplete vehicle is out of the scope. We understand your idea, so we expect to have discussion on this item at the next meeting. We are afraid that your proposal is not clearly understood.	Agreed that this is the responsibility of national authorities as pointed out in Annex 1
3.2			Canada	Why should only the minimum mass in running order be specified? Suggest to also add the Gross Vehicle Mass.		Agreed to replace "may" by "shall" and add "and more" after "less"
3.3	CT inf2-2 3.2	Delete	Hungary Inf2-7	Editorial correction: ... may be specified as a range ...	Your proposal to delete the paragraph of "a range of masses comprising a minimum figure" is rather an important issue to be discussed. This should be discussed at the next meeting.	Canada proposes to treat this in the type approval annex to the respective GTRs. OICA needs to prepare material to show relevance of the concept
4						Change into ... maximum axle capacity of the axles and the maximum tyre capacity ...
5.1 and 5.2				Editorial correction		Change "notional" into "nominal"

6	CT3-12 2.5	Revision of term “pay mass”: “Cargo-carrying capacity” is the figure obtained by subtracting the unladen vehicle mass and the driver and passenger masses from the gross vehicle mass.	Canada Inf2-4		Will change to the Canadian draft. Okay, but “goods-carrying capacity” is better than “cargo-carrying capacity.”	Agreed in principle; see Hungary text below
6	CT inf2-2 6	amend to read	Hungary Inf2-7	“Pay mass” means the good-carrying capacity of the vehicle which is the figure obtained”... and continue the existing text.	This comment is acceptable.	Accepted
6	CT inf2-2 6	Modify	France Inf2-13	“Pay mass” Good-carrying capacity is the figure obtained by subtracting the unladen vehicle mass and the driver and passenger masses from the gross vehicle mass. <u>In the case of a category 1-2 vehicle, the pay mass shall have a numerical value (in kg) not less than 100 x V, where V is the total volume of baggage compartments, in m³.”</u>	This should be discussed at the Ottawa meeting.	Study reservation: Canada wants to discuss with their manufacturers. OICA will consult their members. Seems more a requirement than a common definition. To move to the specific GTR, as done in Regs 36 and 52?
7	CT3-12 2.8	“Maximum towable mass” means the maximum mass capable of being towed by a vehicle as defined by the vehicle manufacturer.	Canada Inf2-4		Will change to the Canadian draft. Okay.	Agreed, but second sentence is already deleted
7	CT inf2-2 7	The abbreviations GVM and GTM should be clarified somewhere in the Annex (para. 4 and ???).	Netherlands Inf2-8	The abbreviations GVM and GTM should be clarified somewhere in the Annex (para. 4 and ???).	Revision of 3.2.	Deleted
7	CT3-12 2.8	“Maximum towed mass”	Japan		Change completed Is “maximum towable mass” more suitable?	Agreed

8						Change into: "Maximum axle capacity" means the permissible mass corresponding to the maximum mass to be carried by the axle as defined by the vehicle manufacturer, not exceeding the axle manufacturer's specifications
9						Change "mass" into "capacity" and add a the end . . . not exceeding the tyre manufacturer's specifications
10	CT3-12 2.9	"Maximum mass of vehicle combination" means the sum of the maximum total masses of towing and towed vehicles as defined by the manufacturer of the motor vehicle	Canada Inf2-4		Canadian draft will be adopted; items 7, 8, and 12 under "Mass" have duplicate expressions and will be deleted. Contents are okay; "towed mass" will be changed to "towable mass."	Paragraph deleted

Annex 3 Dimensions

1.1 1.2 1.3	CT inf2-2	amend to read	Hungary Inf2-7	use "shall not" instead of "must not"	This comment is acceptable.	Agreed: shall
1.1	CT inf2-2 1.1	According informal document No. 13 of the meeting of 8-9 October 2001 we suggest to add to the list of item to be not taken into account during measuring the length:	Netherlands Inf2-8	- de-mountable spoilers and - exhaust pipes.	This should be discussed at the Ottawa meeting	Agreed to add these to the list. Change title into "Structural length" Same for 2.1 and 3.1 Delete "... provided that the loading capacity of the vehicle is not increased" Add, on request from Germany, after mirrors: "or other devices for indirect vision"

1.2 2.2 3.2	CT3-12 3.1 3.2 3.3	“Overall length” → Structural	Canada Inf2-4		Would “total length” be suitable? Does it feel like a native expression? Revised “Total length” → “Total structural length”	Change title into: “Overall length”. Same for 2.2 and 3.2
2.1	CT3-12 3.1	Deletion of “custom sealing”	Canada Inf2-4		Mainly required by the UK. → Are there doubts regarding the need for a global decision?	Not agreed to delete
2.1	CT3-12 3.2	Deletion of dimensional requirements following “Overall width” -access ramps, lifting platforms and similar equipment in their stowed position”	Canada Inf2-4	No particular objections.	Revised	Agreed to delete the references to dimensions Add “running boards” at the end of the list (proposal from Canada) Add after mirrors: “or other devices for indirect vision”
2.1	CT inf2-2 2.1	According informal document No. 13 of the meeting of 8-9 October 2001 we suggest to add to the list of item to be not taken into account during measuring the width:	Netherlands Inf2-8	- de-mountable mudguard broadening.		Agreed
5			Canada			Change “tread” into “track”. Delete “means” after “axle”.