

### **Driver's door as emergency door for other passengers.**

Paragraph 7.6.1.9 of Annex 3 to UN/ECE-Regulation 107 permits the use of the driver's door as an exit for passengers when the driver's compartment is accessible for the passengers by means of the test gauge for the gangway. The driver's door on its turn should be accessible by means of a test gauge with a dimension of 600 x 400 mm. In theory this means that the driver's door can be an emergency door or an emergency window.

To be accepted as an emergency door the provisions the provisions on the "Access to emergency doors" of paragraph 7.7.2 should be met. If not, then the driver's door can only be accepted as an emergency window. However, the accessibility provisions of paragraph 7.7.2 of Annex 3 do not apply to vehicles having a capacity not exceeding 22 passengers. This means that Regulation 107 permits that that in case of an emergency 22 passengers will have to leave the vehicle via the driver's seat through an opening of 600 x 400 mm.

I think that such a situation is not acceptable. For the seats alongside the driver's seat and the additional seats in the driver's compartment as mentioned in paragraph 7.6.1.7.2. the present situation could be continued. But for the other situations I suggest that for accepting the driver's door as an emergency door that door should meet the accessibility provisions of 7.7.2.1 to 7.7.2.4 or that the number of passengers for the exemption of paragraph 7.7.2 should be reduced to [12].

#### **Proposal:**

Annex 3, paragraph 7.7.2 amend to read:

7.7.2. Access to emergency doors (see annex 4, figure 5)

The following requirements shall not apply to driver's doors used as emergency exits **under the conditions of paragraph 7.6.1.7.2** in vehicles having a capacity not exceeding ~~22~~ [12] passengers.

Present text of the relevant text of Regulation 107:

7.6.1.7. If the driver's compartment does not provide access to the passenger compartment by means of a passageway complying with one of the conditions described in paragraph 7.7.5.1.1., the following conditions shall be met:

7.6.1.7.1. The driver's compartment shall have two exits, which shall not both be in the same lateral wall; when one of the exits is a window, it shall comply with the requirements set out in paragraphs 7.6.3.1. and 7.6.8. for emergency windows.

7.6.1.7.2. One or two seats are permitted alongside the driver for additional people, in which case both of the exits referred to in paragraph 7.6.1.7.1. shall be doors.

The driver's door shall be accepted as the emergency door for the occupants of those seats, provided that it is possible to move a test gauge from the

occupants' seats to the exterior of the vehicle through the driver's door (see Annex 4, figure 27).

Verification of the access to the driver's door shall be subject to the requirements of paragraph 7.7.3.2., by using the test gauge having a dimension of 600 x 400 mm, as described in paragraph 7.7.3.3.

The door provided for the passengers shall be in the side of the vehicle opposite to that containing the driver's door and shall be accepted as the emergency door for the driver.

Up to five additional seats may be fitted in a compartment incorporating the driver's compartment, provided that the additional seats and the space for these seats comply with all requirements of this Regulation and at least one door giving access to the passenger compartment complies with the requirements of paragraph 7.6.3. for emergency doors.

7.6.1.7.3. In the circumstances described in paragraphs 7.6.1.7.1. and 7.6.1.7.2., the exits provided for the driver's compartment shall not count as one of the doors required by paragraphs 7.6.1.1. to 7.6.1.2., nor as one of the exits required by paragraph 7.6.1.4., except in the case mentioned in paragraphs 7.6.1.7.1. and 7.6.1.7.2. Paragraphs from 7.6.3. to 7.6.7., 7.7.1., 7.7.2. and 7.7.7. shall not apply to such exits.

7.7.2. Access to emergency doors (see annex 4, figure 5)

The following requirements shall not apply to driver's doors used as emergency exits in vehicles having a capacity not exceeding 22 passengers.

7.7.2.1. The free space between the gangway and the emergency door aperture shall permit the free passage of a vertical cylinder 300 mm in diameter and 700 mm high from the floor and supporting a second vertical cylinder 550 mm in diameter, the aggregate height of the assembly being 1400 mm.

The diameter of the upper cylinder may be reduced at the top to 400 mm when a chamfer not exceeding 30 degrees from the horizontal is included.

7.7.2.2. The base of the first cylinder shall be within the projection of the second cylinder.

7.7.2.3. Where folding seats are installed alongside this passage, the free space for the cylinder shall be required to be determined when the seat is in the position for use.

7.7.2.4. As an alternative to the dual cylinder, the gauging device described in paragraph 7.7.5.1. may be used (see annex 4, figure 6).

