

**Amendments to paragraph 7.6.1.7. [to 7.6.1.10](#) of R.107.03**

<b>R.107.03 Actual</b>	<b>Proposed new text</b>
<p>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:</p>	<p>7.6.1.7. If the driver's compartment does not provide access to the passenger compartment by means of a passageway <b>that permits the front edge of the cylindrical gauge defined in paragraph 7.7.5.1. to reach at least the vertical plane tangential to the foremost point of the driver's seat back (this seat being situated in its rearmost longitudinal position) and, from this plane, it must be possible to move the panel shown in Annex 4, figure 7, in such a way that starting from the contact position with the cylindrical gauge, the panel side facing the exterior of the vehicle is displaced forwards until it reaches at least the vertical plane tangential to the foremost point of the driver's seat cushion</b> <del>complying with one of the conditions described in paragraph 7.7.5.1.1.,</del> the following conditions shall be met:</p>
<p>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.</p>	<p>7.6.1.7.1. The driver's compartment shall have two exits, which shall not both be in the same lateral wall. <u>When one of the exits is a window, it shall have a minimum area of 400,000 mm<sup>2</sup>., it shall be possible to inscribe in this area a rectangle measuring 500 mm x 700 mm. and it shall</u> comply with the requirements set out in paragraph 7.6.8. for emergency windows.</p>
<p>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.</p>	<p><u>Justification: in paragraph 7.6.1.7.3 it is written that paragraph 7.6.3 doesn't apply. To prevent any misunderstanding whether</u></p>

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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.

7.6.3.1.3 will be applicable I suggest to copy the text of 7.6.3.1.3. into this paragraph 7.6.1.7.1.

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). Does this mean that there are no minimum dimensions for the driver's door as long as the test gauge of 600 x 400 mm can be moved to the exterior?

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. Are the minimum dimensions for an emergency door applicable?

~~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. **Paragraphs 7.6.3. to 7.6.7., 7.7.1., 7.7.2. and 7.7.7. shall not apply to such exits.**

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	<p>7.6.1.7.4. 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 and any seats alongside the driver 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 <b>emergency</b> exits required by paragraph 7.6.1.4. <b>for any other passenger compartment</b>, <del>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.</del></p> <p>7.6.1.7.5. Up to five additional seats may be fitted in a compartment incorporating the driver's compartment <b>and any seats alongside the driver</b>, provided that the additional seats and the space for these seats comply with all requirements of this Regulation and at least one <b>of the emergency exits required by paragraph 7.6.1.4. is a door</b> giving access to the passenger compartment <b>complying</b> <del>complies</del> with the requirements of paragraph <b>7.6.3.1.2.</b> <del>7.6.3.</del> for emergency doors.</p> <p><b>QUESTION:</b> Do such vehicles exist? Can we delete this sub-paragraph?</p>
<p>7.6.1.8. If the driver's compartment and any seats adjacent to it are accessible from the main passenger compartment by means of a passageway complying with one of the conditions described in paragraph 7.7.5.1.1., no external exit is required from the driver's compartment.</p>	<p>7.6.1.8. If the driver's compartment <b>is accessible from the main passenger compartment by means of a passageway complying with the requirements of paragraph 7.6.1.7.</b> and any seats adjacent to it are accessible from the main passenger compartment by means of a passageway complying with one of the conditions described in paragraph 7.7.5.1.1., no external exit is required from the driver's compartment.</p>
<p>7.6.1.9. If a driver's door or other exit from the compartment is provided in the circumstances described in paragraph</p>	<p>7.6.1.9. If a driver's door or other exit from the <b>driver's</b> compartment is provided in the circumstances described in</p>

<p>7.6.1.8. it may only count as an exit for passengers provided:</p> <p>7.6.1.9.1. it satisfies the requirements relating to the dimensions of emergency door indicated in paragraph 7.6.3.1.;</p> <p>7.6.1.9.2. it fulfils the requirements indicated in paragraph 7.6.1.7.2.;</p> <p>7.6.1.9.3. the space reserved for the driver's seat shall communicate with the main passengers' compartment through an appropriate passage; such requirement shall be deemed to be fulfilled if the test gauge described in paragraph 7.7.5.1. can move unobstructed from the gangway, until the front end of the gauge reaches the vertical plane tangential to the foremost point of the driver's seat back (this seat being situated in its rearmost longitudinal position) and, from this plane, the panel described in paragraph 7.6.1.7.2. could be moved to the emergency door in the direction established by such paragraph (see Annex 4, figure 28) with seat and steering wheel adjustment in their mid position.</p>	<p>paragraph 7.6.1.8. it may count as <b>one of the required exits</b> for passengers <b>in vehicles of Class A or B</b> provided:</p> <p><u>The word "only" is confusing as it is not clear whether the restrictions are only valid for vehicles of class A and B and that it will always be possible to use te driver's door of a vehicle of class I, II or III as an exit for the passengers or that it is only possible for buses of class A and B under the further conditions of the sub paragraphs of 7.6.1.9. are met.</u></p> <p>7.6.1.9.1. it satisfies the requirements relating to the dimensions of emergency door indicated in paragraph <del>7.6.3.1.2.</del> <del>7.6.3.1.</del>;</p> <p>7.6.1.9.2. it fulfils the requirements indicated in paragraph 7.6.1.7.2.;; <u>I believe that this is not clear which provisions of 7.6.1.7.2 should be applied. I would prefer copying the relevant provisions of 7.6.1.7.2. in this subparagraph.</u></p> <p>7.6.1.9.3. the space reserved for the driver's seat shall communicate with the main passengers' compartment through an appropriate passage; such requirement shall be deemed to be fulfilled if the test gauge described in paragraph 7.7.5.1. can move unobstructed from the gangway, until the front end of the gauge reaches the vertical plane tangential to the foremost point of the driver's seat back (this seat being situated in its rearmost longitudinal position) and, from this plane, the <b>test gauge panel</b> described in paragraph 7.6.1.7.2. <del>can could</del> be moved to the emergency door in the direction established by such paragraph (see Annex 4, figure 28) with seat and steering wheel adjustment in their mid position.</p> <p><b>[7.6.1.9.4. If there is a door opposite the driver's door, the provisions of paragraph 7.6.1.9. shall apply to it, provided that there is not more than one passenger's seat beside the driver.]</b></p>
<p>7.6.1.10. Paragraphs 7.6.1.8. and 7.6.1.9. do not preclude there being</p>	<p>7.6.1.10. Paragraphs 7.6.1.8. and 7.6.1.9. do not preclude there being</p>

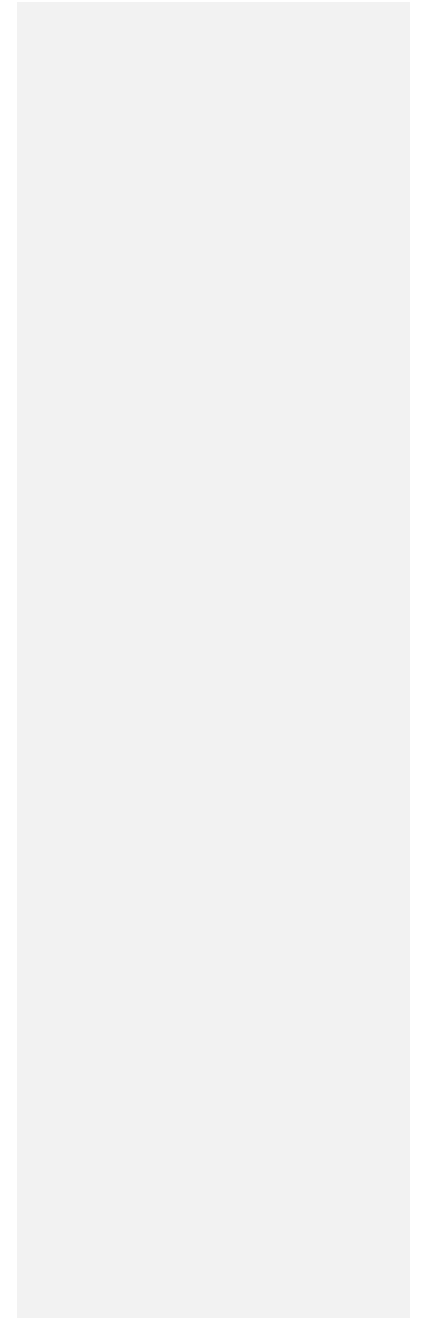
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a door or other barrier between the driver's seat and the passenger compartment provided that this barrier can be released quickly by the driver in an emergency. A driver's door in a compartment protected by such a barrier shall not be counted as an exit for passengers.

a door or other barrier between the driver's seat and the passenger compartment provided that this barrier can be released quickly by the driver in an emergency. A driver's door in a compartment protected by such a barrier shall not be counted as an exit for passengers.



## **Explanation of the proposed modifications:**

Note: The whole of paragraph 7.6.1.7. (including its sub-paragraphs) applies to vehicles in which the driver's compartment does not provide an acceptable passageway to the passenger's compartment.

### Paragraph 7.6.1.7.

None of the conditions described in paragraph 7.7.5.1. are applicable to the driver's compartment. Paragraph 7.7.5.1.1.1. is the most suited but in most vehicles it is impossible to move the panel forward by 660 mm as the facia in front of the driver is usually curved so that the controls are within the driver's reach. The proposal that the gangway test gauge is moved to coincide with the driver's seat back (as for the forward facing passenger seat and for paragraph 7.6.1.9.3. describing how a driver's door can be used as an exit for passengers) and then the panel is moved forward to the foremost point of the driver's seat cushion. This is to ensure that the driver has sufficient free height and width when accessing or leaving his seat.

### Paragraph 7.6.1.7.1.

The requirements for emergency windows are specified in paragraph 7.6.3.1.3. so it is more precise to specify this paragraph rather than paragraph 7.6.3.1., which applies to all exits.

### Paragraph 7.6.1.7.2.

I believe that it is clearer if this paragraph only deals with the driver's seat and seats alongside (without a passageway to the passenger's compartment) and to put the requirements for the five additional seats in a new paragraph (7.6.1.7.5.).

### Paragraph 7.6.1.7.3.

I propose to move the last sentence of paragraph 7.6.1.7.4., which helps to define the technical requirements for the exits defined in paragraphs 7.6.1.7.1. & 7.6.1.7.2., from that paragraph and put it alone in a revised paragraph 7.6.1.7.3. Having prescribed when and where exits are required it is better to fix their technical requirements immediately, rather than to "hide" them as the last sentence of a following paragraph.

### Paragraph 7.6.1.7.3. renumbered as 7.6.1.7.4.

The text of existing paragraph 7.6.1.7.3. is virtually incomprehensible. I believe that the intention is that when the driver's compartment and any passenger seats alongside the driver do not have an acceptable passageway to a passenger compartment, then the driver's door and the passenger's

door on the opposite side of the vehicle are not accessible to any other passengers and shall not be counted as exits for the passenger compartment. (The passenger compartment requires the exits as defined in paragraph 7.6.1. without using the driver's and front passenger's doors).

#### New Paragraph 7.6.1.7.5.

Moved from paragraph 7.6.1.7.2. and modified to make it clear, **but do we really need it?** :

- a) that the five additional seats are in addition to any passenger seats alongside the driver;
- b) that, as there is no passageway between the front seats (driver's and adjacent passenger's) and the five additional seats, these additional seats must be considered as being in a separate compartment with the required number of exits (two), one of which must be an emergency door giving access to the main passenger compartment.

Note: Paragraphs 7.6.1.8. & 7.6.1.9 are specific to vehicles in which there is an acceptable passageway from the driver's and adjacent passenger's seats to the passenger compartment. Paragraph 7.6.1.8. says that in such vehicles an external exit is not required from the driver's compartment, but paragraph 7.6.1.9. says that if an exit is provided it can be counted as an exit for the passengers with no limit on the number of passengers.

#### Paragraph 7.6.1.9.

It should be made clear that when there is an acceptable passageway between the passenger's compartment and the driver's compartment, the driver's door and/or the front passenger's door can only be used for passengers in vehicles of Class A or B. This possibility came from R.52 and did not exist in R.36.

#### Paragraph 7.6.1.9.1.

The requirements for emergency doors are specified in paragraph 7.6.3.1.2. so it is more precise to specify this paragraph rather than paragraph 7.6.3.1., which applies to all exits.

#### Paragraph 7.6.1.9.3.

Paragraph 7.6.1.7.2. refers to a test gauge and not to a panel. The word "can" is more appropriate than "could".

#### Paragraph 7.6.1.9.4.

Paragraph 7.6.1.9.4. is introduced to allow a door for 1 passenger seated alongside the driver to be used as an emergency door for the main passenger compartment. This is taken from paragraph 5.7.2.5. of R.52.