

Re. Concern of Japan on TRANS/WP29/GRSG/1999/29 (the CLEPA GTR draft)

Transmitted by the expert from Japan

1. The Headform Drop Test of M3 Class III vehicles.

Japan proposes that the 1.5m headform drop test shall not apply to M3 Class III vehicles.

(Background)

Tour buses in Japan have windscreen glazing over a large area in consideration of its usage. And thick windscreen glazing that will not easily break is used for windscreen glazing in order to avoid the economic loss when such glazing breaks and to secure the rigidity of the vehicle body front.

Tour buses in Japan have windscreen glazing with a thickness of 11.7mm in maximum. If a 1.5m headform drop test is conducted on such thick glazing, the glazing may not break and could not comply with the requirements in the draft regulation.

Accordingly, Japan proposes to amend the provisions concerning 1.5m headform test, so that thick windscreen glazing can be used at least on M3 Class III vehicles.

2. The Optical Quality for the sidelights requisite for driving visibility

Japan suggests the necessity of the optical quality requirement for the front side glazing.

(Background)

With regard to the front side glazing, Japan has had the optical quality requirement including distortion test and double image test.

Although the CLEPA GTR draft (TRANS/WP29/GRSG/1999/29) delete such requirement, Japan think it is necessary to secure driver's visibility or other safety.