

**REMARKS TO THE IOCA PROPOSAL TO AMEND ECE-REGULATION 107 ON DOUBLE DECK  
VEHICLES (TRANS WP29/GRSG/2003/5)**

Transmitted by the expert of the Netherlands

2.5 Annex 11, §7.1, measurements on a representative vehicle.

Paragraph 7.1 of Annex 11 is not clear on which vehicle the measurements will be based and the consequences for other vehicle from the same vehicle type; it suggests that it will be done on the vehicle that is submitted according paragraph 3.4 of the regulation. However a vehicle that is representative for the “construction of a bus or coach” isn’t necessarily also representative for the “masses and dimensions”. To get reliable (test) results we believe that: the technical service should have the possibility to verify the requirements on more than one vehicle by further aligning the text of paragraph 3.4 of the regulation and §7.1 of annex 11 with the text of directive 97/27/EC as amended by 2003/19/EC.

Furthermore §7.1 doesn’t indicated how to act when the test results differ more than 3 or 5 % of the value stated by the manufacturer. We are in favour of complementing the incomplete last sentence.

Paragraph 7.1 of annex 11 should read:

“7.1 Measurement of the mass of the vehicle in running order and of its distribution among the axles

The mass of the vehicle in running order and its distribution on the axles are measured on the vehicles **submitted in accordance with paragraph 3.4 of this regulation**, placed in a stationary position with their wheels set straight ahead. If the measured masses differ by no more than 3 per cent from the masses stated by the manufacturer for the corresponding technical configurations within the type, or by no more than 5 per cent if the vehicle is of category M2 not exceeding 3500 kg, the masses in running order and their distribution among the axles as stated by the manufacturer are used for the purpose of the requirements below. Otherwise the measured masses must be **used and the technical service may then, carry out additional measurements on vehicles other than those submitted in accordance with paragraph 3.4 of this regulation.**”.

Paragraph 3.4 of this draft regulation should read:

“3.4. A vehicle or vehicles or a bodywork **conforming to the characteristics described in Annex I, Part I, and chosen to the satisfaction of the technical service responsible for conducting the type-approval tests** as representative of the type to be approved shall be submitted to that technical service.“.

2.6 Annex 11, §7.4.3.3

Replace “mj” by “μ<sub>j</sub>” (typing error)

2.7 Annex 11, §7.5.

As off-road vehicles will be excluded from the scope of the regulation §7.1 to 7.5.2 are superfluous.

2.8 Annex 11, §7.6.3.

The requirements on manoeuvrability should be an exact copy of the text of directive 97/27/EC as amended by directive 2003/19/EC.

H.A.J. Jongenelen  
April 2003