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agenda item B.1.4.)

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 21
(Interior fittings)

Transmitted by the Expert from Belgium

Note: The text reproduced below was transmitted by the expert from Belgium in order to clarify the text of the Regulation. It refers to draft Supplement 3 to the 01 series of Amendments to Regulation No. 21 (TRANS/WP.29/868).

Note: This document is distributed to the Experts on Passive Safety only.

A. PROPOSAL

Annex 10,

Paragraph 2.18., amend to read:

" according to the procedure described in paragraph 1. of annex 6, is equal or less than 3.2. mm."

* * *

B. JUSTIFICATION

References:

Annex 10, explanatory notes, paragraph 2.18. of document TRANS/WP.29/868 reads:

"In case of a gap between the edge of a rigid material and the panel, this edge shall be rounded to a minimum radius of curvature depending on the gap shown in the table in the explanatory note to paragraph 5.1.1. This also applies, if the height of the projection, determined according to the procedure described in paragraph 1. of annex 6, is equal or less than 3.2 mm.

If the gap is located in a zone where a head impact test has to be carried out, the edges which can be contacted during the test(s) resulting from displacement of parts shall be protected by a minimum radius of 2.5 mm."

Problem:

Technically, it is almost impossible to measure the radius of curvature of the concerned edges during the head form impact test since the shape of some parts could change during the impact tests. Since the text of the proposal is very unclear on how, what and when to measure (precision), and due to the incoherence of the requirements, this will give rise to diverse interpretations at the manufacturers, technical services and Authorities.

Before the test, the radius of curvature of 2.5 mm is only mandatory for gaps of more than 20 mm.

For gaps of less than 20 mm, the radius of curvature can be less than 2.5 mm depending on the gap (see table Annex 10, explanatory notes, item 5.1.1.)

After the test, the only requirement for these edges is no protrusion or displacement so as to increase the hazards to passengers or the severity of injuries.

Solution:

In order to avoid any confusion, the following text should be deleted from the current proposal:

"If the gap is located in a zone where a head impact test has to be carried out, the edges which can be contacted during the test(s) resulting from displacement of parts shall be protected by a minimum radius of 2.5 mm."
