



**Economic and Social
Council**

Distr.
GENERAL

TRANS/WP.29/GRSG/2004/22
23 July 2004

Original: ENGLISH
ENGLISH AND FRENCH ONLY

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

World Forum for Harmonization of Vehicle Regulations (WP.29)

Working Party on General Safety Provisions (GRSG)

(Eighty-seventh session, 12-15 October 2004,
agenda item 3.)

PROPOSAL FOR DRAFT AMENDMENT TO REGULATION No. 107
(General construction of M2 and M3 category vehicles)

Transmitted by the expert from Norway

Note: The text reproduced below was transmitted by the expert from Norway. It refers to document TRANS/WP.29/988 (text corresponding to the Revision 1 of the Regulation).

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

PROPOSAL

Annex 3

Paragraph 7.2.2.2.9., amend to read:

"7.2.2.2.9. the surface of the wheelchair space(s). ~~when considered occupied by a wheelchair user(s)~~, see paragraph 7.2.2.4."

Paragraph 7.6.5.1.2., amend to read:

"7.6.5.1.2. in the case of interior controls, are placed on, or within **300 mm** of, the door, at a height of not less than **1300 mm** ~~160 cm~~ above the first step;"

* * *

JUSTIFICATION

Paragraph 7.2.2.2.9.

In the accordance to the definition of class 2 bus, class 2 buses can have no more than one wheelchair space. The problem arises when there are more than one wheelchair space in a class 2 vehicle. Then the (available) area for standing passengers exceeds "the place equal to two double seats", which can lead to the conclusion that the bus is no longer a class 2 vehicle, but should be interpreted as a class 1 vehicle (city bus). The problem only exist if one defines the open free space when there is not a wheelchair in place, as "area for standing passengers".

Paragraph 7.6.5.1.2.

There should be one common location of opening devices for emergency doors placed maximum 1300 mm above floor level (as in EU Directive 2001/85/EC, Annex 7). In Annex 3 of the Regulation the minimum required height for opening devices for such doors must be at least 1600 mm above floor level. In the EU Directive 2001/85/EC, Annex 7 the requirement for the same opening devices is "maximum 1300 mm", when there are wheelchair users in the bus. Those two contradictory requirements makes it impossible to standardize the placement of the emergency opening devices. In some cases a bus is prepared sometimes to allow wheelchair users and sometimes not. Then two distinct but identical opening devices are needed for the same door, which makes nonsense. The sensible solution is to require that the opening device be placed no higher than 1300 mm in either case, making it available for all groups of people to operate it in an emergency.
