

Short report on the comments received during GRSP-37:

General comment from the US:

More detail is required in the preamble. The US is aware that some data may not be available however, this should then be stated in the preamble. They asked some questions to highlight their concerns:

- does the rigid impactor drive the design in the right direction
- need to justify the speed, what kind of dynamics are occurring during the impact
- is it technically feasible to meet the tests and what are the countermeasures

For more details, please see GRSP-37-18 (INF GR / PS / 122). The document also includes detailed remarks on the regulatory text which are not repeated below.

FlexPLI update:

Japan presented their documents GRSP-37-15 and 16 (INF GR / PS / 123 and 124). These documents give an update on the activities of the Technical Evaluation Group. The goal is to finish their activities by 2007. Japan also requested to reinsert the FlexPLI test method in the preamble.

Page 8 item (b):

Italy clarified that the ISO recommendation is to limit the weight to 2,5 tonnes as well (ISO/3933).

Mr Mizuno clarified the weight limit is a political discussion and that the 3,5 tonnes was included in the gtr to satisfy certain market needs. Mr Mizuno asked for more input from OICA and authorities to supply information on the weight of the current vehicles. OICA noted that the main issue is with the US vehicle park and data on that was presented in INF GR / PS / 40 (US). This document shows that 97,7% of their car park is covered with a weight limit of 2,5 tonnes.

It was concluded that the issue needs to be split in two:

- technically: there is a need for a validation process to extend the scope from 2,5 to 3,5 tonnes
- politically: guidance is needed on how a gtr scope should be dealt with

Further to this the GRSP Secretariat voiced its concern on the approach included in the table (§2). Under the 98 Agreement a Contracting Party is obliged to start the legislative process for implementing a gtr into its legislation. However, this table would imply that Contracting Parties decide up front if they will apply the gtr and to what extent.

Page 10 item (i):

The US remarked that a lot of background data on biofidelity is included for the FlexPLI whilst not the same amount of explanation is given for the rigid impactor. This may be better balanced. The US also asked why the rigid legform was chosen as the test tool. Mr Mizuno explained the rigid legform is the only impactor readily available and the FlexPLI still needs some further finetuning. Also the rigid impactor is a good tool even if the FlexPLI is more biofidelic.

Page 16 §2.5:

The US would like to see this clarified.

Page 34 §6.3.1.1:

France asked for more details on the characteristics of the foam flesh and the knee joint. Mr Mizuno asked the EC for help in supplying more details. The EC promised to look into this.

Page 40 §6.3.2.1 and page 42 §6.3.2.2:

Poland asked to include characteristics for the material of the headforms. Only saying “synthetic skin” is not sufficient.

Mr Mizuno said it will be difficult to specify the material. The headforms need to comply with the certification tests.