

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 14  
(Safety-belt anchorages)

Submitted by the expert from Germany

Note: The text reproduced below was prepared by the expert from Germany on behalf of the Technical Services Group (TSG) on Regulation No. 44 (child restraints) concerning the potential misuse of top tether anchorages for ISOFIX child restraint systems. It refers to a document without a symbol (informal document No. GRSP-39-6), distributed during the thirty-ninth session of GRSP (see report ECE/TRANS/WP.29/GRSP/39, para. 19) and supersedes document ECE/TRANS/WP.29/GRSP/2006/19.

The modifications to the current text of the Regulation are marked in **bold** characters or marked as strikethrough.

A. PROPOSAL

Paragraph 5.2.4.5., amend to read:

"5.2.4.5. ... and unlatching to it. ~~For e~~Each ISOFIX top tether anchorage ~~under a cover, the cover~~ **must be clearly identifiable.**

**A top tether is clearly identifiable in case misuse is avoided by**

- **designing without exception all anchorages for top tether anchorage or**
- **marking all permissible top tether anchorage points using symbols set out in figure 13 or**
- **vice versa marking of non top tether anchorage points**

**If under a cover the top tether anchorage** shall be identified by for example one of the symbols or the mirror image of one of the symbols set out in figure 13 of annex 9; the cover shall be removable without the use of tools. **ISOFIX top tether anchorages at a seating position without ISOFIX lower anchorages shall not be marked."**

B. JUSTIFICATION

Sometimes there are anchorages in the luggage compartment of a vehicle only for the use of luggage fixation and those anchorages have been misused as a top tether anchorage because the top tether anchorage besides was not marked as a top tether anchorage. Thus making top tether anchorages clearly identifiable seems to be necessary. A maximum of flexibility should be permitted to the manufacturers provided the misuse of anchorage points is reduced to a minimum.

Vehicles for the market of the United States of America but possibly driving on European roads may be equipped on the rear bench with 3 top tether anchorages although only the 2 outboard seating positions are equipped with lower ISOFIX anchorages. If all top tether anchorages are marked as top tether anchorages this may offer the misuse that a top tether from an outboard seating position is fixed at the central top tether anchorage.