

Transmitted by the expert from Russian Federation

Informal document No. GRSG-97-06
(97th GRSG, 20 – 23 October 2009
agenda item 3(a))

ENGLISH
Original: RUSSIAN

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 107
(M2 AND M3 CATEGORY VEHICLES)

A. PROPOSAL

Annex 3, paragraph 7.3., amend to read:

“7.3. ~~(reserved)~~ **Strength of the superstructure.**

Only in the case of single-deck Class B vehicles having a capacity not exceeding 16 passengers it shall be shown by calculation or by any other suitable method that the structure of the vehicle is strong enough to withstand an evenly-distributed static load on the roof applied down in the vertical direction and equal to the technically permissible maximum laden mass (M) of the vehicle.”

B. JUSTIFICATION

The mandatory requirements for the strength of the superstructure of small capacity vehicles of Class B (irrespective of their capacity) are set in the Regulation No.52 (paragraph 5.4.), however the approvals on the basis of the Regulation No.52 are no longer granted (starting from 1st April 2008).

In the present text of the Regulation No.107 (including document GRSG-96-17 from Spain adopted at the 96th GRSG session), there will be no prescriptions for the strength of the superstructure of small capacity vehicles of categories M2 and M3.

In the Regulation No.66 (including the draft 02 series of amendments approved by the majority of GRSG experts, see document GRSG-96-32, as well as the reports on 95th and 96th GRSG sessions represented in the documents ECE/TRANS/WP.29/GRSG/74, paragraphs 6-8 and ECE/TRANS/WP.29/GRSG/75, paragraph 4) also there will be no mandatory requirements for the strength of the superstructure of Class B vehicles having a capacity from 9 to 16 passengers.

Thus, in the UN ECE Regulations a gap arose in regards to regulating the strength of the superstructure of Class B vehicles having a capacity from 9 to 16 passengers, which may result in appearance on potentially the market of potentially dangerous vehicles (which bodies might be made, for example, of wood or any other fragile materials, due to the absence requirements to the strength).

At the 95th and 96th GRSG sessions, the Russian Federation expressed the concern about that matter. The Russian Federation also announced the intention to submit the related proposals at the 97th GRSG session in October 2009 in order to improve the current situation.

The Russian Federation proposes a gradual approach: at the first stage to apply the already validated requirements of the Regulation No.52, which would allow to eliminate promptly the vacuum arisen in the regulating; and at the second stage to work on the further development of the provisions concerning the strength of the superstructure of the said vehicles, e.g. selecting the test types (dynamic or static loading), location, direction and energy of impact, etc.

The provisions proposed in this document, namely the verification of the strength of the superstructure by the application to the roof of the evenly-distributed vertical static load equal to the technically permissible maximum laden mass of the vehicle, are not new since they practically fully repeat the requirements of the paragraph 5.4. of the Regulation No.52.

The efficiency of the proposed provisions has been verified for many years of application of the Regulation No.52, and the requirements themselves and the methods of proving compliance are well-known by both vehicle manufactures and the Technical Services.

Introduction of those provisions into the Regulation No.107 actually means their automatic transfer from one Regulation to the other, which will not require from the manufactures introducing any change into bus design or production technology. Thus, no transitional period for the preparation for their implementation is required.

It is very important fact that the introduction of those provisions as mandatory would allow to maintain the already attained post-accident (passive) safety level of Class B vehicles having a capacity from 9 to 16 passengers.
