

## **Proposal for draft amendments to Regulation N° 107 (M<sub>2</sub> and M<sub>3</sub> Vehicles)**

Changes to the current text of the Regulation are indicated in bold and strike-through characters.

### **I. Proposal**

*Annex 3, paragraph 7.7.8.1.3., amend to read:*

“7.7.8.1.3. For vehicles **not exceeding a width of 2.35 m** ~~in width or less:~~

**7.7.8.1.3.1.** the width of the available space for each seating position, measured from a vertical plane passing through the centre of that seating position at heights between 270 mm and 650 mm above the uncompressed seat cushion, shall be 200 mm (see Annex 4, figure 9A). In case of compliance with this paragraph the requirements of paragraph 7.7.8.1.2. shall not apply; **and**

**7.7.8.1.3.2.** **in the case of vehicles of Class III, the minimum width of the seat cushion, dimension "F" (Annex 4, figure 9A), measured from a vertical plane passing through the centre of that seating position, shall be a minimum of 200 mm. In case of compliance with this paragraph the requirements of paragraph 7.7.8.1.1.2. shall not apply.”**

### **II. Justification**

Paragraph 7.7.8.1.1. requires that the seat cushion of a Class III vehicle is at least 225mm wide. Paragraph 7.7.8.1.2. further requires that the space available for passengers is 250mm or 225mm depending on whether it is an individual seat or a continuous row of seats for two or more passengers. These requirements are confirmed in Annex 4 Figure 9.

Paragraph 7.7.8.1.3. contains a relaxation for vehicles with a width not exceeding 2.35m. That paragraph permits the space for passengers to be reduced to 200mm. This then aligns with the seat cushion width for classes other than Class III – but there does not appear to be a corresponding relaxation in the seat cushion width for Class III vehicles.

However, though Figure 9A shows the 200mm required by 7.7.8.1.3., that paragraph does not refer to a reduction in the requirement for Class III vehicles.

In our opinion, the figures are correct, and it would seem reasonable to introduce in paragraph 7.7.8.1.3. a reduction in seat width for Class III vehicles to align with that which exists for other classes of vehicles as it does with regard to the space for passengers.

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