

## **Proposal from the United States on Phase 2 amendments to UN GTR No. 9 on Pedestrian Safety (ECE/TRANS/WP.29/GRSP/2014/15)**

Phase 2 proposes to amend the UN Global Technical Regulation No. 9 on pedestrian safety by introducing the flexible pedestrian legform impactor (FlexPLI) as a single harmonized test tool in order to enhance the level of protection for pedestrian lower legs. NHTSA has expressed concern that the injury assessment reference values (IARVs) for this GTR will meet the needs for injury mitigation in the U.S. We previously suggested including the injury risk curves only, with Contracting Parties choosing appropriate IARVs when implementing this GTR in national legislation. We recognize that the IWG added language to Part A in an attempt to address our concerns and IARVs are currently in square brackets to both allow for further discussion and to provide additional time for the US to complete its benefits analysis. In order to allow this Phase of the GTR to move forward, the US is proposing the following:

### **Part B of the Preamble:**

Amend Paragraphs 217 and 218 of the text to read:

**217. At the sixth meeting of the IWG, the USA noted that while it would be in a position to agree with the injury risk curves ... with Contracting Parties choosing appropriate injury assessment reference values (IARVs) when implementing the gtr in national legislation. In subsequent discussions to this meeting, the USA agreed to accept the proposed IARVs so Phase 2 of the GTR could move forward, and would propose changes to the IARVs through the normal UN process if changes to the IARVs are warranted by a benefits analysis conducted during the adoption process in their domestic regulations.**

**218. While the IWG rejected the suggestion of including only the injury risk curves, it is understood that the USA will conduct a full analysis of the impacts of the IARVs of the gtr. The USA will conduct fleet testing with the FlexPLI to evaluate the benefits. It would be also examined possible incremental improvements, such as the effect of lowering injury threshold values. These efforts could result in future recommendations to adjust the injury risk values and other aspects of this gtr. The USA will report back to the UN any recommended adjustments to the IARVs once its cost/benefits analysis has been completed.**

Text of the Regulation:

Paragraph 5.1.1. – Remove the square brackets.

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