

## **Proposal for the 04 series of amendments to Regulation No. 80 (Strength of seats and anchorages (buses))**

The text reproduced below was prepared by the experts from OICA in order to amend to ECE/TRANS/WP.29/GRSP/2018/10 submitted by the expert from Germany.

The modifications to the text of the proposal are marked in bold characters or marked as strikethrough.

### A. PROPOSAL

Paragraph 7.1.3., replace by:

"7.1.3. The torque to attach the seat anchorages **to the seat rail** in order to meet the requirements of Appendix 1 shall be specified by the vehicle manufacturer. This requirement does not apply **to fixed seats, to interlocking seat fastenings** ~~fixations~~ and **to seat fastenings** ~~fixations~~ with a defined force application."

Paragraphs 12.10 to 12.14., replace by:

- "12.10. As from the official date of entry into force of the 04 series of amendments, no Contracting Party applying this UN Regulation shall refuse to grant or refuse to accept UN type-approvals under this UN Regulation as amended by the 04 series of amendments.
- 12.11. As from 1 September ~~2019~~**2022**, Contracting Parties applying this UN Regulation shall not be obliged to accept UN type-approvals to the preceding series of amendments, first issued after 1 September ~~2019~~**2022**.
- 12.12. Until 1 September ~~2020~~**2024**, Contracting Parties applying this UN Regulation shall accept UN type-approvals to the preceding series of amendments, first issued before 1 September ~~2019~~**2022**.
- 12.13. As from 1 September ~~2020~~**2024**, Contracting Parties applying this UN Regulation shall not be obliged to accept type-approvals issued to the preceding series of amendments to this Regulation.
- 12.14. Contracting Parties applying this UN Regulation shall not refuse to grant UN type-approvals according to any preceding series of amendments to this UN Regulation or extensions thereof."

### B. JUSTIFICATION

Paragraph 7.1.3: The requirement relating to the torque indication is only applicable for seat fastenings that can be moved by sliding along a rail, using e.g. nuts and bolts. On the contrary, the torque indication is not valid in other cases, such as fixed seats, distinct interlocking positions seat fastenings or fastenings using force application.

Paragraphs 12.10 to 12.14: The proposed date of 2019 for new approvals is clearly not feasible from an administrative point of view, since the proposed amendments could, at best, enter into force around mid-2019 at the very earliest. Secondly, the dynamic test requirements are being amended as well such that, even in the case of vehicles using the current dynamic test procedure, re-development would be needed as well as quite a number of re-testing, and the test facility resources are likely not sufficient. Therefore, OICA suggests some additional lead-time.

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