



Submitted by the expert from
OICA

Informal document **GRSG-116-25**
(116th GRSG, 1-5 April 2019
agenda item 2(a))

Specific Issues for M2-Buses of Class B with Transition from 05-series of UN Regulation No. 107 to 06-series of amendments



Requirements for Roof Hatches and Consequences

- **ECE-107.05**
For size and siting of exits vehicles of classes A and B could alternatively refer to Annex 7. Annex 7 para. 1.2 did not restrict the exact position of escape hatches.
- **ECE-107.06**
Siting of exits is described in Annex 3 for all vehicle classes.
- **Annex 3:**
7.6.2.8. Required escape hatches shall be positioned as follows: (a) If there is only one hatch, it shall be situated in the middle third of the passenger compartment; or ...

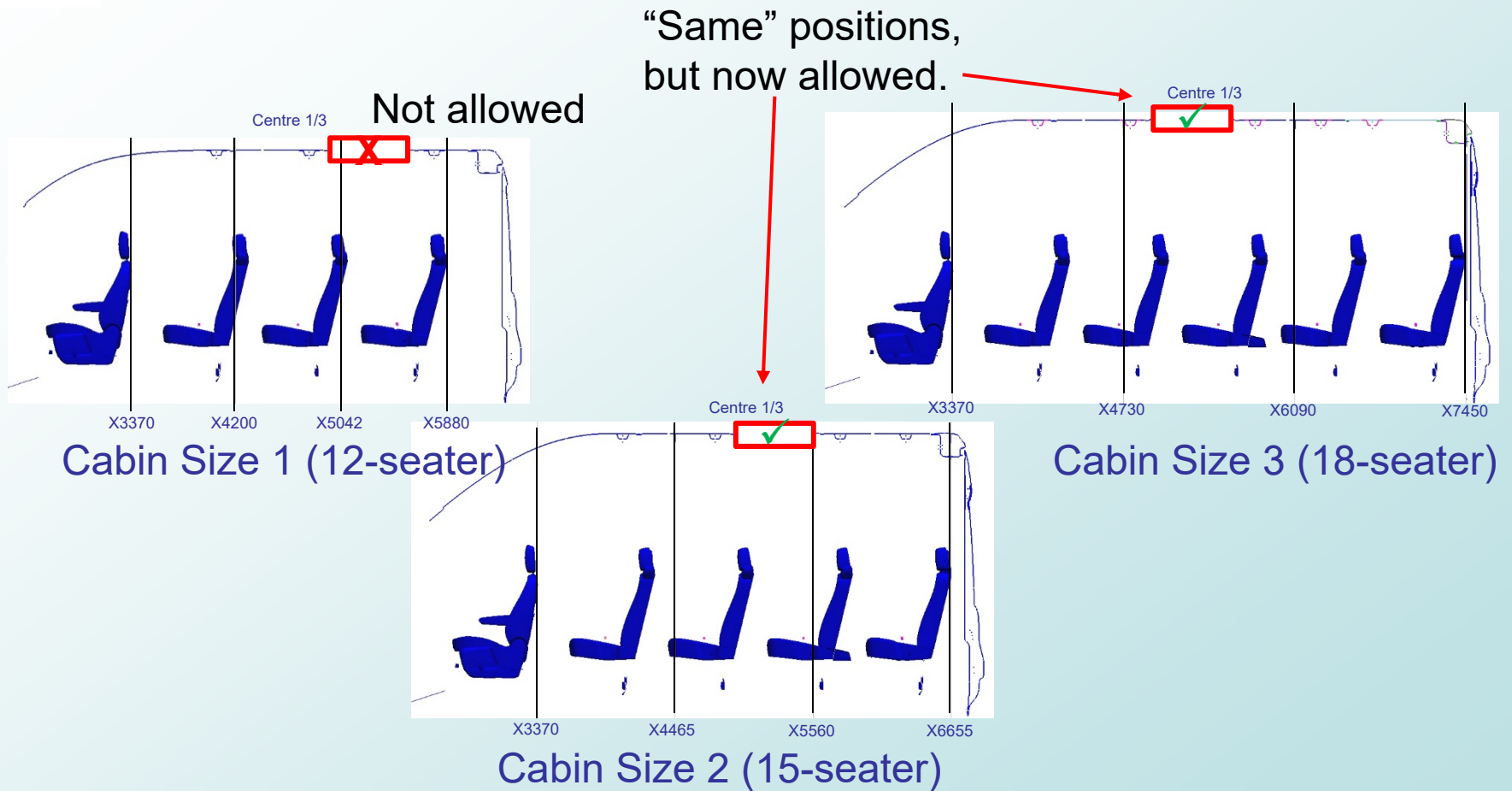


Issues with 06-series regarding escape hatch positions

- Longitudinal extension of “passenger compartment” not defined in UN R107, hence not unambiguous where middle third exactly is:
 - Is measurement from rear of driver’s compartment to end of seating space or to end of cabin?
- Especially on a short vehicle, with the length of the passenger compartment measuring ~2.5m, the exact location of the escape hatch is not relevant.
- The regulatory restriction causes the roof hatch to be located overlapping with the service door. This is not seen as an advantage for evacuation routes, causes issues with roll over strength (→UN R66).



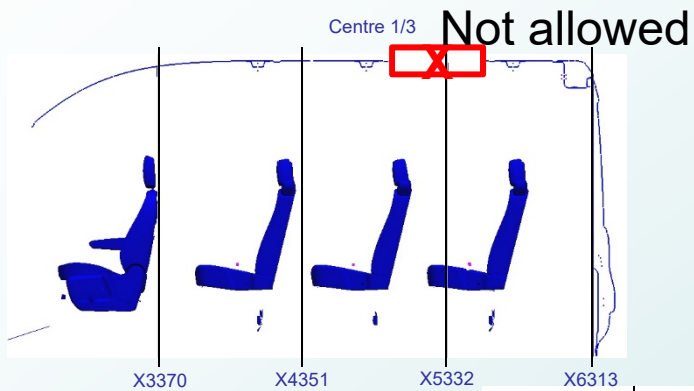
Roof Hatch Position Examples – Passenger Compartment = Front seat to rear seat



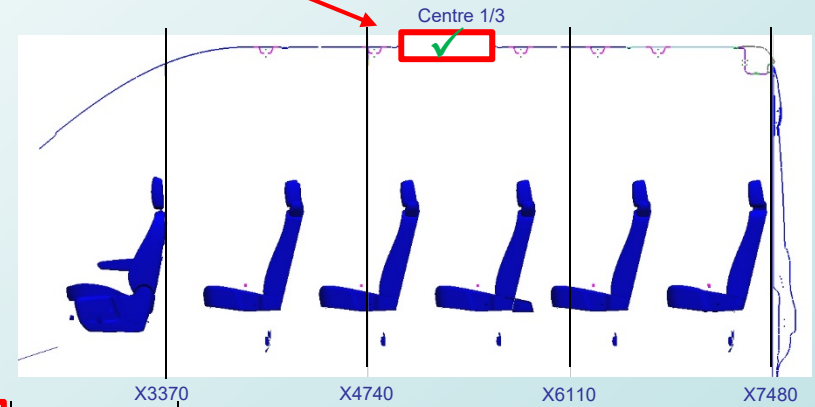


Roof Hatch Position Examples – Passenger Compartment = Front seat to rear door

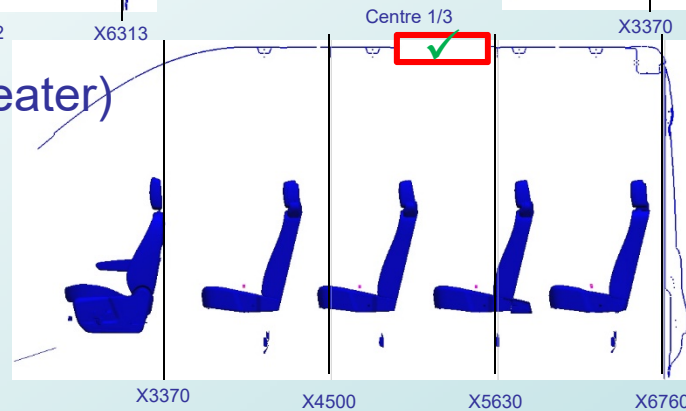
“Same” positions,
but now allowed.



Cabin Size 1 (12-seater)



Cabin Size 3 (18-seater)



Cabin Size 2 (15-seater)