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Working Party on General Safety Provisions (GRSG)
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PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 43
(Safety glazing)

Transmitted by the Expert from Japan

Note: The text reproduced below was prepared by the expert from Japan in order to modify the proposal of document TRANS/WP.29/GRSG/1999/12/Rev.1 to which it refers. This document is based on a document distributed without a symbol (informal document No. 4) during the seventy-ninth session (TRANS/WP.29/GRSG/58, para.49).

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Note: This document is distributed to the Experts on General Safety Provisions only.

GE.01-
A. PROPOSAL

Annex 14,

Insert new paragraph 6.1.3.3., to read:

"6.1.3.3. For sun roofs, the abrasion test is not required."

Annex 16,

Insert new paragraph 6.1.3.3., to read:

"6.1.3.3. For sun roofs, the abrasion test is not required."

Annex 21,

Paragraph 4.2.2.2., to be put in square brackets to indicate a need for further consideration.

Paragraph 4.2.2.3., amend to read:

"4.2.2.3. In the case of plastic panes, the safety glazing shall bear the additional symbol A/L, B/L, C/L or X/L as defined in paragraph 5.5.5 or 5.5.7. of this Regulation."

Paragraph 4.2.3.3., amend to read:

"4.2.3.3. Where sun roofs are constituted of plastic panes, they shall bear one of the additional symbols, as defined in paragraph 5.5.5. or 5.5.7. of this Regulation."

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B. JUSTIFICATION

Re. annexes 14 and 16, new paragraph 6.1.3.3.:

The regular light transmittance is not required for sun roofs because they are requisite neither for direct nor indirect driver's vision. Therefore, such glazing can be exempted from the abrasion resistance requirement in the same way as in document TRANS/WP.29/GRSG/1999/12.

Re. annex 21, paragraph 4.2.2.2.:

An effect on promoting safety caused by regulating regular light transmittance of glazing concerning the driver's indirect vision obtained by means of the interior rear view mirror and two external rear-view mirrors is well understood. However, Japan proposes further consideration of paragraph 4.2.2.2.

The reasons for re-consideration are the following: when considering future adoption of Regulation No. 43 and taking it into domestic regulation, the accident data shall be examined, searching for problems related to visibility
through the interior rear-view mirror or regular light transmittance of glazing concerning indirect vision obtained by interior and external mirrors. This is necessary in order to explain the reasons why regular light transmittance of rear glazing should be regulated although, in Regulation No. 43 and former domestic regulation, the interior mirror is not requested for vehicles having two exterior rear-view mirrors. Also trucks having no indirect view obtained by the interior mirror because of their beds are not considered as endangering safety. Therefore, the basis for the "30 per cent" requirement should be clarified.

In addition, with respect to the glazing concerning the driver's indirect vision obtained by means of the interior rear view mirror and two external rear-view mirrors, a transmittance of approximately 20 per cent, 30 per cent or 50 per cent is used in Japan. The transmittances are expressed in approximate values, because they differ according to plane thickness, and these have not caused any particular safety problems.

Re. annex 21, paragraph 4.2.2.3.: 

In case of no head impact, C/L might be applicable. Paragraph 5.5.7. (rigid plastic double-glazed unit) is to be added in this provision in addition to paragraph 5.5.5., because the possibility to use rigid plastic double-glazed unit for sun roof should be accepted to allow the unhindered development of new technologies.

Re. annex 21, paragraph 4.2.3.1.: 

Paragraph 5.5.7. (rigid plastic double-glazed unit) is to be added in this provision in addition to paragraph 5.5.5., because the possibility to use rigid plastic double-glazed unit for sun roof should be accepted to allow the unhindered development of new technologies.