

**Japan's Position on Proposed Revision of TRANS/WP.29/GRSP/2001/4  
Child Restraint System (CRS)**

Transmitted by the Expert from Japan

1. Background

The above proposal was presented to the 28 GRSP meeting as Informal Document No.4, together with supplemental data on the specifics of the proposal. While this proposal will be discussed in the context of a formal document, the Expert from Japan through this letter would like to urge the adoption of the proposal, by demonstrating the fact that the proposed changes will not detract from the safety of CRS users.

2. Documents concerning Japan's Proposed Revision of Buckle Requirements

2-1. "Japan's Supplementary Explanation on Proposed Amendment to Buckle Requirements for Child Restraint Systems" [Document 1]

This is a document to explain in greater detail the amendments proposed by Japan.

2-2. "Difference between ECE-compliance Buckle and Japan's Proposed Buckle" [Document 2]

This document demonstrates that Japan's proposed buckles, easy to operate and precluding incorrect manipulation, are equivalent with ECE-compliance buckles.

2-3. "CRS Harness Belts: Types and Incorrect Manipulations" [Document 3]

This document demonstrates that Japan's proposed 5-point continuous belts and Y-shaped belts preclude any possibility of incorrect manipulation even in case the tongue plate is locked only on one side.

3. Document concerning Japan's Proposed Revision of Retractor Requirements (Permission of WSIR-type Retractor) [Document 4]

Presenting the results of a rapid braking test and a low-speed sled test to the preceding GRSP meeting, Japan proved the equivalence of child restraining performance between VSIR and WSIR retractors.

For the upcoming meeting, Japan will submit the results of a progressive brake test, which indicate no difference in the child restraining performances of WSIR and VSIR retractors.

4. Document concerning Japan's Proposed Revision of Rearward-facing Child Restraint System Requirements. [Document 5]

The proposed revision is in harmony with Japan's Safety Regulations and is in conformity with MVSS 213. It is noteworthy that MVSS 213 has continuously been kept in force in North America as the regulation has proved to ensure excellent safety for CRS in real use.