



Informal document N° 9
(32nd GRSP, 10-13 December 2002
agenda item B.1.5)

ECE REGULATION 29 – CABS OF COMMERCIAL VEHICLES

OICA COMMENTS TO TRANS/WP29/GRSP/2002/18

I. INTRODUCTION

By preparing document TRANS/WP29/GRSP/2002/18, the United Kingdom has brought in a valuable contribution to the whole issue of cab strength requirements.

Although OICA at this stage is not yet able to express a firm position, some basic remarks can be made on this proposed revision to Regulation 29.

OICA's clear aim is to reach, whenever possible and feasible, global harmonization of vehicle technical requirements. As concerns commercial vehicle cab strength, the current Regulation 29 unfortunately does not offer such perspective since only a limited number of countries have actually signed this Regulation.

OICA expresses the firm hope that any revision of Regulation 29 will enable a growing number of countries to sign it, offering the prospects of a wide international, and possibly even global, harmonization.

As concerns the United Kingdom proposal contained in document TRANS/WP29/GRSP/2002/18, OICA wishes to enter a general study reservation. Following a first review of the UK proposal, OICA suggests the following preliminary detailed comments.

II. PRELIMINARY DETAILED COMMENTS TO TRANS/WP29/GRSP/2002/18

Paragraph 1, OICA proposes that the scope should be defined as follows:

"This Regulation applies to commercial vehicles which are intended for the carriage of goods, having a separate driver's cab and a technically permissible maximum mass exceeding 2 tonnes. Vehicles meeting the requirements of Regulation 94 and its 01 series of amendments are exempted from the requirements of this Regulation. It does not apply to agricultural tractors and machinery."

Reason: OICA believes that 2 tonnes provides an accurate way of separating car-derived N1 vehicles from N1 vehicles specifically designed as commercial vehicles. Any final decision on this subject should however also be linked with the future evolution of Regulation 94, in particular the extension from its current scope.

Paragraph 5.2, amend to read:

"Vehicles, or cabs for vehicles, not exceeding 7.5 tonnes TPPM shall ..."

Reason: While the N2 category includes vehicles exceeding 3.5 tonnes up to 12 tons in GVW, it is often divided into two sub-categories at 7.5 tonnes in ECE Regulations and EC Directives.

Consequently, the UK proposal (TRANS/WP29/GRSP/2002/18), which specifies a differentiation at 7 tons GVW, is inconsistent with other regulatory items, and will possibly introduce a factor of confusion in the ECE Regulation and EC Directive and complicate the ECE/EC certification systems.

Paragraph 5.3, amend to read:

"Cabs for vehicles, exceeding 7.5 tonnes TPMM shall be ..."

Reason: see paragraph 5.2 above.

Paragraph 5.5.4, amend to read:

"After undergoing ... non-resilient parts. To facilitate installation, the manikin may be inserted in dismantled form and assembled in the cab. For this purpose, the seat shall be adjusted to its most rearward position and the manikin completely assembled and so placed that its H point coincides with the R point. The seat shall then be moved forward to its median position for the assessment of the survival space."

Reason: alignment with paragraph 5.5.1.

Paragraph 5.5.5, replace by:

"The space so defined shall be verified for every seat provided by the manufacturer."

Reason: alignment with paragraph 5.5.2.

Paragraph 5.6.1., replace by:

"During the tests, the components by which the cab is secured to the chassis frame may be distorted or broken, provided that the cab remains attached to the chassis frame."

Reason: alignment of tests D and E with tests A, B and C.

Paragraph 5.7, replace by:

"Any test need not be carried out if the manufacturer can show, to the satisfaction of the Technical Service, by calculations or other means that the strength of the cab (or the component parts of the cab) is sufficient to prevent deformation dangerous to the occupants (penetration into the survival space) if subjected to the conditions of these tests."

Reason: allow calculation for all tests.

Paragraph 10.3, should be deleted.

Reason: application of these new requirements to existing vehicle models appears totally unfeasible.

Annex 3, para. 4.2.4, delete the words:

"[and 45 kJ for vehicles for which the permissible maximum mass exceeds this value.]"

Annex 3, para. 5, amend to read:

"5. Roof strength (test B)

The roof of the cab ... subject to a maximum load of 100 kN. This load ..."

Annex 3, paragraph 6, correct "2 kn" into "2 kN".

Annex 6, para. 4.1.4, amend to read:

"... the impact energy shall be [40] kJ."

Annex 6, para. 5.2, amend to read:

"... subject to a maximum load of 100 kN."
