



Informal document No. **13**  
(131<sup>st</sup> WP29, 11-14 November 2003  
agenda item 4.2.33.)

**OICA COMMENTS TO TRANS/WP29/2003/85  
PROPOSAL FOR DRAFT SUPPLEMENT 1 TO THE 02 SERIES OF AMENDMENTS  
TO REGULATION No. 95**

Draft supplement 1 to the 02 series of amendments to Regulation 95 is intended to replace the current side impact test dummy, known as EuroSID with a revised dummy known as EuroSID-2.

In reaching a decision on this proposal, GRSP experts recognised that there remain significant problems with EuroSID-2, which should be resolved by modification before the use of the new dummy becomes mandatory.

GRSP experts also recognised the desirability of harmonising test devices between Regulation 95 and the US FMVSS214 safety standard, for which a new dummy, possibly a modified version of EuroSID-2 is likely to be adopted in the next few years.

GRSP therefore proposes a transitional period of 36 months from entry into force of the supplement, during which time EuroSID or EuroSID-2 may be used as alternatives, and envisages possible modifications to EuroSID-2, and consequent further supplements to the Regulation to include them.

OICA is, of course, very much in favour of a harmonised test tool for Regulation 95 and the US standard. However we believe that an opportunity exists to achieve this harmonisation, and at the same time obtain the advantages of a far superior dummy, with increased biofidelity, repeatability, and measurement capabilities.

Some time ago, activities began in the framework of ISO, strongly supported by the worldwide automobile industry, to develop a new, globally harmonised dummy, known as WorldSID. The aim of these activities was to gather the best available expertise worldwide in order to develop a new generation dummy with unprecedented biofidelity and measurement capabilities; this dummy should then become the unique test tool worldwide, allowing manufacturers to develop the best possible side impact protection technologies on a globally harmonised scale.

The world automobile industry has invested enormous resources in the development of WorldSID and is convinced that WorldSID presents significant advantages over any other existing side impact dummy.

The WorldSID programme is nearing completion. Thanks to the large resources invested in development, WorldSID is now very close to finalisation. WorldSID final production release is scheduled in the first quarter of 2004, so that it could then be specified in the regulatory requirements shortly thereafter. Contrary to past dummy development programmes, both industry and regulators have already gained test experience with this device. For this reason it would certainly be possible to adopt it within the 36 month transitional period proposed to allow modifications to EuroSID-2.

The IHRA Biomechanics Working Group will make a recommendation to the IHRA Side Impact Working Group (SIWG) on the best available test device to use in the SIWG's recommended test procedures. Indications are that the 50%ile male WorldSID rates better than the currently available side impact dummies. Industry has provided in principle support for the development of a small female version of WorldSID that is also needed for the SIWG's recommended test procedures. This presents the opportunity for a GTR being developed from the IHRA SIWG recommendations to use mid-male and small female versions of WorldSID in a globally harmonised side impact regulation – a world first.

OICA is concerned that if either the United Nations or the United States adopts a version of EuroSID-2 at this time, it will effectively postpone the introduction of WorldSID as a harmonised vehicle certification tool, for many years and possibly indefinitely. This would be a great waste, both of the opportunity to use a superior tool to produce superior vehicles for our customers, and of the extensive resources devoted to the programme. Such a waste of resource would make the industry very cautious about participating in similar global development programmes in the future.

The automobile industry strongly requests WP29 to delay a decision on this proposal until the alternative of replacing EuroSID with WorldSID can be evaluated, early in 2004. The industry will be making similar strong representations to the US NHTSA and is hopeful for an outcome that will further the cause of vehicle safety and also of global harmonisation.

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