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PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 44
(Child restraints)

Transmitted by the expert from the European Association of Automotive Suppliers (CLEPA)

Note: The text reproduced below was transmitted by the expert from CLEPA. It refers to document TRANS/WP.29/2003/38, adopted by the AC.1 at its twenty-fourth session (TRANS/WP.29/926, para. 105) as proposal for draft Supplement 5 to the 03 series of amendments to Regulation. No. 44.

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

1. INTRODUCTION

Document TRANS/WP.29/2003/38 reflects all the relevant changes and complements Regulation No. 44 for the introduction of the ISOFIX system. In this context, the definition of the support legs was amended especially in relation to Group 1 misuse test. CLEPA considers that the amended paragraphs 7.1.4.1.9. and 7.1.4.1.10.1.2. are not very clear and rather inconsistent.

They are meant to test the following potential misuse situation and strength issues:

- non use of a support leg;
- adjusted length of the support leg;
- requirement that the support leg may not be destroyed depending on length installations and cause hazard for child.

Questions that arise:

- how is "permanent" defined?
- is the support leg installed in lengths not touching the floor (compatibility?), which is in contradiction with the fact that the leg shall be supported by the trolley floor pan (which has 2 extreme dimensions)?
- should ISOFIX systems be treated differently from non-ISOFIX systems when a support leg is used regarding the length adjustment, what would be inconsistent?

The proposal below tries to contribute to accurate interpretation of the text and is based on experience in applying requirements to new product solutions.

2. PROPOSAL

Paragraph 7.1.4.1.9. a), add at the end:

"...in annex 6. The floor pan will be adjusted to these minimum and maximum lengths of the support leg. If there is clearance between the shortest length and the highest floor pan, the leg is adjusted to the highest floor pan level of 70 mm. If the maximum support leg length is more than the lowest floor pan height, 210 mm length adjustment is used. Length adjustments of support legs will be tested according to 7.1.4.1.9. "

Paragraph 7.1.4.1.10.1.2., amend to read:

"7.1.4.1.10.1.2. without the anti-rotation device in use. This requirement does not apply neither when a permanent and non-adjustable support leg is used as an anti-rotation device, nor to anti-rotation devices that are automatically and always in position when the CRS attachments are able to catch the ISOFIX anchorages in the car. Length adjustments of support legs will be tested according to 7.1.4.1.9. "

Alternative proposal for the underlined text:

"...nor to anti-rotation devices that cannot be misused (non-used) in combination with ISOFIX attachment."

3. JUSTIFICATION

Re. Paragraph 7.1.4.1.9.:

The length adjustment is done to test the 2 extreme lengths of the support leg and the floor pan height is accommodated to those lengths. The text clarifies when the leg has more adjustability than the 70-210 mm.

Re. Paragraph 7.1.4.1.10.1.2.:

There can be solutions when a support leg is not permanent (in position) but will automatically and unmistakably be present when attached to the ISOFIX anchorages.

Not leaving room for such solutions (automatic positioning of the leg when attachment to anchor bars is adequate) with a similar result/function as permanent systems is design restrictive.

Not requiring the misuse test in such case is in accordance with the proposal of OICA (Informal document No. 6 distributed during the thirty-second session of GRSP).

Re. both paragraphs:

In accordance with paragraph 7.1.4.1.9 one should be able to have unidirectional length adjustment in the leg and therefore tests have been defined. For semi-universal (forward facing and rearward facing, ISOFIX and non-ISOFIX) systems, the term "non adjustable" in para. 7.1.4.1.10.2. is not consistent with this.

A misuse mode of using the support leg not touching the floor pan could for a rearward facing system have an equally negative result, but this is not defined and not the purpose of this paragraph.

The text added at the end of the paragraph clarifies the situation regarding support legs as the length adjustment should not be regarded as misuse. This is valid for both ISOFIX and non-ISOFIX systems.
