



Informal document N° 3
(33rd GRSP, 2-6 June 2003
agenda item B.1.1)

AMENDMENTS TO UN/ECE R14 – SAFETY BELT ANCHORAGES

OICA COMMENTS TO THE PROPOSAL BY JAPAN: TRANS/WP29/GRSP/2002/16

I. INTRODUCTION

The recently adopted Supplement 4 to the 05 series of amendments to Regulation 14 (TRANS/WP29/888) incorporated new requirements for vehicles of category N, in particular by introducing new prescriptions for the rear seats and requiring the mandatory installation of two belt anchorages.

Japan has now introduced a new proposal (TRANS/WP29/GRSP/2002/16) which, in the understanding of OICA aims at requiring the installation of three belt anchorages in the rear outboard seats of N1 category vehicles.

II. THE OICA POSITION

OICA generally accepts the Japanese proposal but believes it should be slightly corrected to:

- ⇒ clarify the different requirements for the different vehicle categories;
- ⇒ clarify the meaning of the different footnotes currently identified by the symbols Ø, # and *. As a reminder, the current R14 prescriptions define these symbols as follows:
 - # = two required in exposed seating positions
 - Ø = two anchorages permitted on outboard seating positions where there is a passage to permit access to other parts of the vehicle
 - * = two anchorages permitted if the windscreen is located outside the reference zone

OICA believes that document GRSP/2002/16 somewhat mixes up these different symbols, more so since symbol # (exposed seating position) was deleted by document TRANS/WP29/888.

III. OICA PROPOSAL

- a) It is proposed to clarify the table of document TRANS/WP29/GRSP/2001/16 as follows:

	Outboard		Centre		Rear facing
	Front	Other	Front	Other	
N1	3	3 or 2 Ø	3 or 2 *	2	2
N2, N3	3	2	3 or 2 *	2	2

This would, OICA believes, fully meet the intent of the Japanese proposal.

- b) Additionally, existing paragraph 5.3.3 should be amended to read:

“5.3.3 However, for outboard seating positions, other than front, of vehicles of category M1 and N1, shown in annex 6 and marked with the symbol Ø, two lower anchorages are allowed, where there exists a passage ...”
(remainder unchanged)

- c) The amendments suggested to paragraphs 5.3.6 and 5.3.7 to 5.3.10 should not be retained since the former paragraphs 5.3.5 and 5.3.6 have already been deleted as per document TRANS/WP29/888, leading to renumbering of the old paragraphs 5.3.7 – 5.3.10 to 5.3.5 – 5.3.8.
- d) Also, the suggested amendment to paragraph 5.3.5 should not be retained since the latest paragraph 5.3.5 now relates to M3/M2 vehicles and since the OICA proposal detailed in a) and b) above renders further amendments superfluous.
- e) Finally, the question of application dates should be carefully considered since TRANS/WP29/GRSP/2002/16 should be seen together with Supplement 4 to the 05 series of amendments to Regulation 14 (document TRANS/WP29/888). OICA considers it would be logical to have these new prescriptions applied at exactly the same dates as document TRANS/WP29/888 in order to guarantee a certain stability in the Regulation.
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