

Transmitted by the expert from the Russian Federation

Comments on the Netherlands proposal for draft 02 series of amendments to Regulation № 46
 (TRANS/WP.29/GRSG/2002/10)

Regulation № 46.01	Regulation № 46.02	Comments
<p>Paragraph 7.2.3.2.</p> <p>Minimum value of “r” of the main exterior rear-view mirrors is 1800 mm for Class II and 1200 mm for Class III.</p>	<p>Paragraph 6.1.2.2.4.2.</p> <p>Minimum value of “r” of the main exterior rear-view mirrors is reduced up to 1200 mm for Class II.</p>	<p>Reducing radii of curvature will result in an even greater image distortion and difficulty of estimation of distances to mobile objects through the main mirrors of Class II.</p>
<p>Paragraph 16.3.6.</p> <p>Where the lower edge of an exterior mirror is less than 2 m above the ground when the vehicle is loaded to its technically permissible maximum laden mass, this mirror must not project more than 250 mm beyond the overall width of the vehicle measured without mirrors.</p>	<p>Paragraph 15.2.2.6.</p> <p>A ledge of the mirror is increased up to 250 mm.</p>	<p>Increasing the ledge of mirrors beyond the overall width of the vehicle we consider possible for vehicles of M3, N2 and N3 categories, but not for vehicles M1, N1 and M2 categories.</p>

<p>Paragraph 16.5.</p> <p>Establishes the requirements to fields of vision through the rear-view mirrors.</p>	<p>Paragraph 15.2.4.2. - 15.2.4.6.</p> <p>The level of requirements to fields of vision through the mirrors of Classes II, III, IV and V is increase, and requirements to fields of vision in front and behind a vehicle are added.</p>	<p>The draft 02 series of amendments offers to increase fields of visions through the mirrors of Classes II, III, IV, V by reducing radii of curvature (for Classes II, IV and V) and increasing sizes (for Classes II and III) of reflecting surface.</p> <p>Reducing a radii of curvature of the main exterior view-mirrors of Class II will inevitably result in an even greater image distortion and difficulty of estimation of distance to mobile objects. It is especially dangerous in cases when a driver has to estimate the road situation quickly (for example, if it is necessary to make a maneuver at a high speed of motion).</p> <p>In opinion of the Russian experts, the necessity of increasing the requirements to fields of vision through exterior mirrors is dictated only by the presence of “shadow areas”.</p> <p>Taking into account the explained reasons, we suppose that the requirements of a Regulation № 46 to values a fields of vision through the main exterior mirrors should be left without change, and the problem of “shadow areas” must be decided by other ways: application of aspherical mirrors or additional mirrors (for example, mirrors of Classes IV and V) on vehicles of all categories.</p>
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The other amendment proposals the Regulations № 46 in document TRANS/WP.29/GRSG/2002/10, are agreed.
