

**SUBJECT: REGULATION No. 52, SMALL CAPACITY
PASSENGER VEHICLES, M2 AND M3 CATEGORY**

Ref. Document No.: TRANS/WP.29/GRSG/2004/1-Russian Proposal

INDIA'S COMMENTS

1. The suggested amendment implies requirement of space above each seating position in the first row to be 120 cm measured from mean floor level for all vehicles covered under Regulation No. 52. Is this interpretation correct?
2. Paragraph 5.7.8.3 provides minimum height of highest point of uncompressed seat cushion to be equal to 40 cm from mean floor level. Vehicles to which paragraph 5.7.1.9 applies, the highest point of uncompressed seat cushion will be 30 cm above mean floor level considering 90 cm free space above the highest point of the uncompressed seat cushion.
Therefore, seat having 30 cm height should be provided with additional legroom to compensate reduced seat height (from 40 cm to 30 cm).
3. Clarification required for the “**first row of seats**”. Does it mean seats in the line of driver’s seat or the first row of seats behind the driver’s seat?