



INTERNATIONAL ORGANIZATION OF MOTOR VEHICLE MANUFACTURERS

Proposal for applicability



Basic principle

- Define an applicability that is acceptable to all
- If a Contracting Party wishes to expand the applicability defined in the gtr, it can do so upon national implementation of the gtr. The preamble could give guidelines on the requirements for the expansion and the range of the expansion.
 - It should be noted that for gtr 1 “door locks” the application only specifies category 1-1 and category 2 vehicles. However, in the NPRM also buses with a GVW of 4536 kg or less are included.
 - This shows that expanding a gtr nationally is possible



Accident data was already presented (HR-4-10 – Japan) , showing there is no real world justification to raise the weight limit above 3500 kg

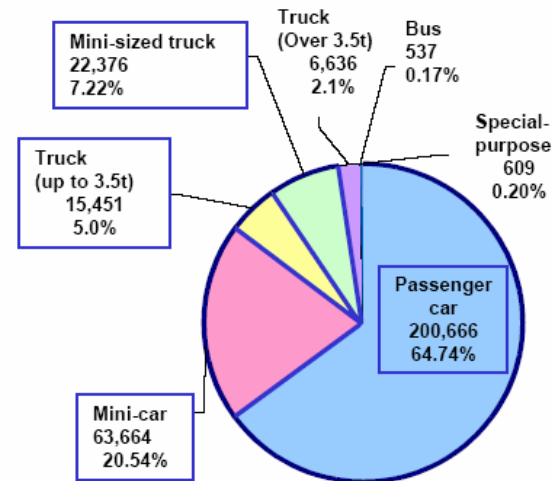
Number of Occupants Sustaining Neck Injuries in Rear-Impacted Vehicles by Vehicle Class (2004)

Vehicles with GVW up to 3.5t account for 97.5% of rear-impacted vehicles which occupant(s) sustained neck injury.

Rear-impacted Vehicles

GVW	Vehicle Class	Number of Occupants	Subtotal by GVW
Up to 3.5 t	Passenger car	200,666	302,157 (97.5%)
	Mini-car	63,664	
	Truck (up to 3.5 t)	15,451	
	Mini-sized truck	22,376	
Over 3.5 t	Truck (Over 3.5 t)	6,636	7,173 (2.3%)
	Bus	537	
Others	Special-purpose	609	609(0.2%)

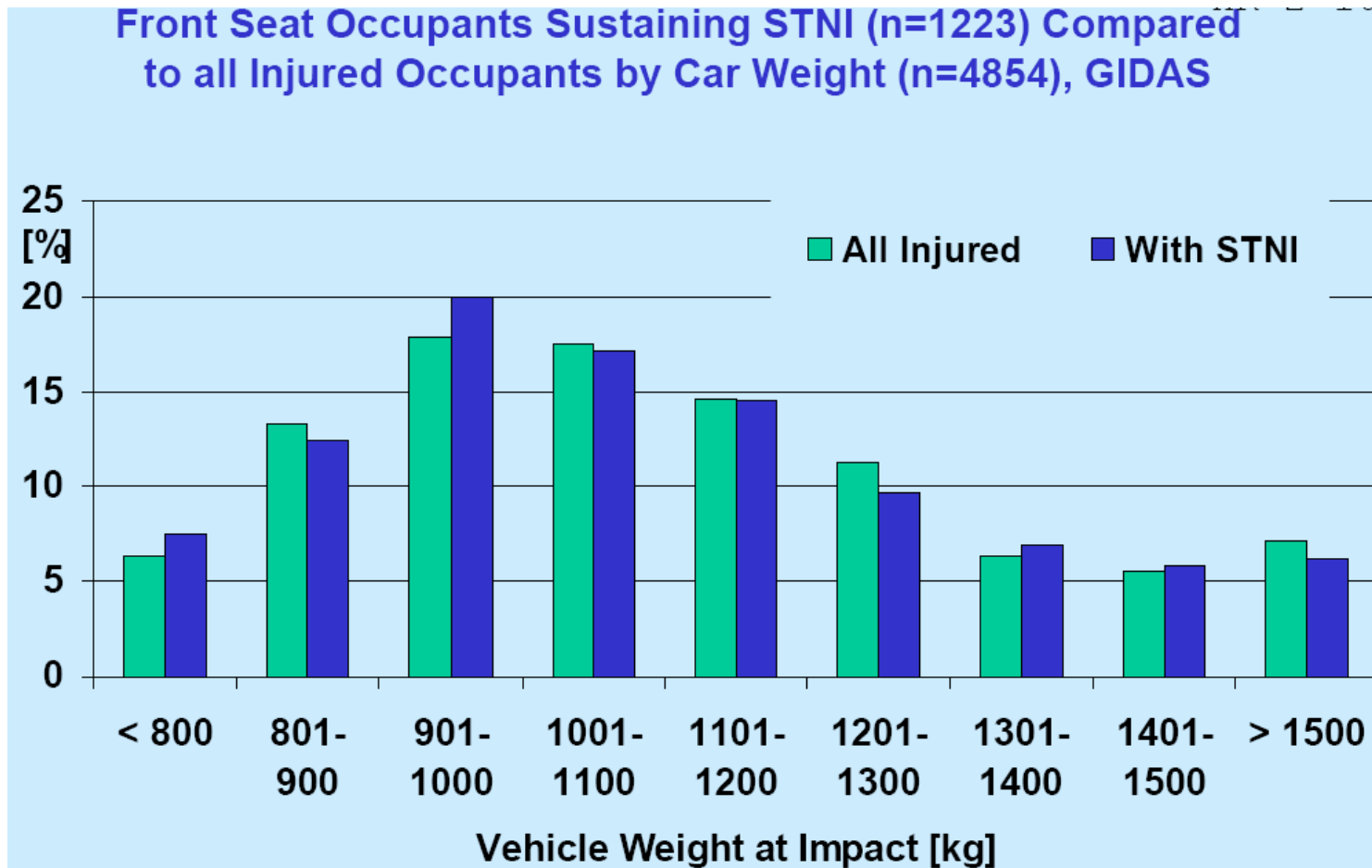
Number of occupants sustaining minor neck injury in rear-impacted vehicles: 309,939





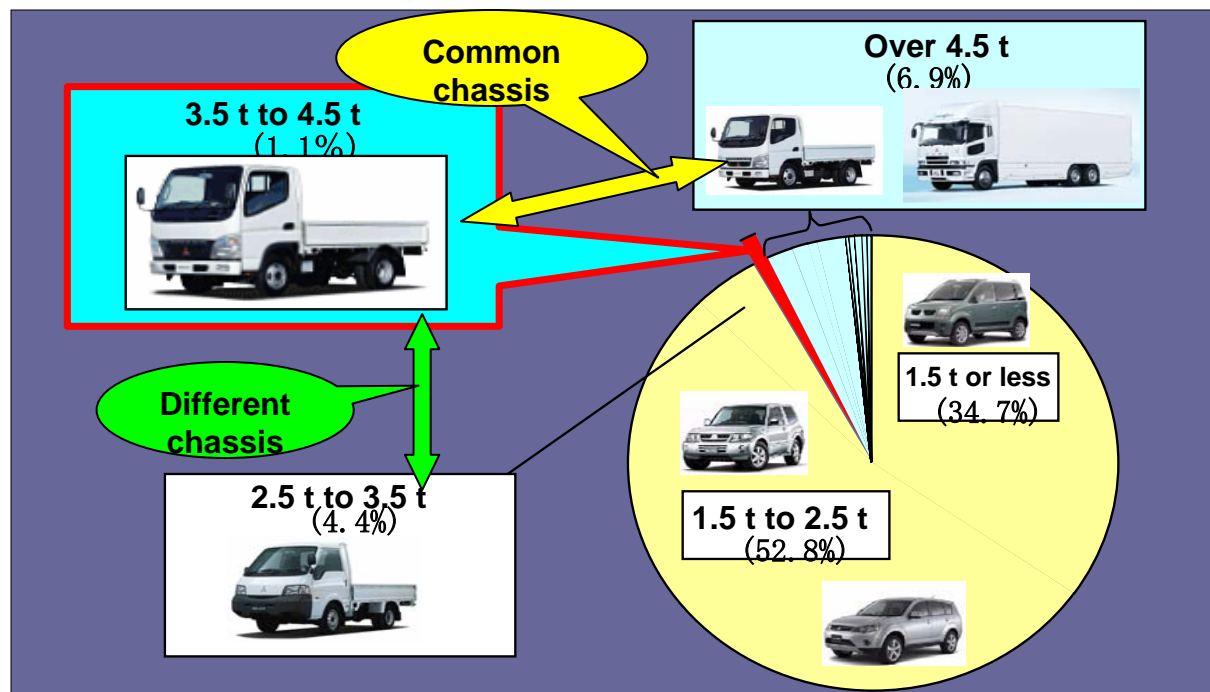
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Accident data was already presented (HR-2-10 – OICA), showing the decrease in whiplash injury with the increase in weight



What vehicles would be included outside US when enlarging the scope from 3500 kg to 4536 kg?

- This represents a problem as the chassis is used for a vehicle model range exceeding the 4536 kg limit (HR-5-18- Japan).
- The scope would on paper be widened up to 4536 kg but in practice to 7500 kg (N2 vehicles)
 - whilst in reality, these vehicles do not occur in the accident statistics for whiplash
 - and there is no cost benefit justification for inclusion of these vehicles





Situation in the Korean market is very similar to the Japanese market



- Enlarging the GVW from 3500 kg to 4536 kg would affect only trucks
- These vehicles are irrelevant in the accident statistics for whiplash



Conclusion and proposal

- **Conclusion: The upper weight limit should be 3500 kg.**

- **Proposal: §2. Application:**
“This standard applies to Category 1-1 vehicles, Category 1-2 vehicles with a gross vehicle mass of up to 3500 kg and Category 2 vehicles with a gross vehicle mass of up to 3500 kg.”