

Proposal for draft corrigendum to Revision 2 of Regulation N°44

Interpretation of “how to perform energy absorption test in regulation N°44”

A. PROPOSAL

Paragraph 7.1.2.1 amends to read:

“For all devices with backrests, the areas defined in Annex 18 to this regulation, when tested according to Annex 17, shall give a peak acceleration of less than 60 g. This requirement applies also to areas of impact shields which are in the head strike area.”

Paragraph 7.1.2.1 delete:

“material in”

Annex 15 delete the explanatory note

~~“Paragraph 7. 1. 2. 1. and annexes 17 and 18 Either energy absorbing material, or the integral material of the child restraint structure can be tested for compliance with Annex 17 and 18; where the structure is not homogenous, or if there is likely to be varying performance over the child restraint system structure, the testing organisation will determine the worst case for testing compliance. The energy absorbing material may form the whole or part of the child restraint system cover.”~~

Annex 17: modify as follows:

Paragraph 3.1 delete:

“for the support (directly beneath the point of impact) and”

Paragraph 3.2 amends to read:

“The assembled Child restraint shall be placed in the region of impact on a rigid flat surface, as shown in figure B, for example a solid concrete plane”.

Figure B

Annex 18: replace the text of paragraph 1 by the following:

- 1. “Place the device on the test seat described in Annex 6. Reclinable devices shall be set in the most upright position. Place the smallest manikin in the device in accordance with the manufacturer’s instructions. Mark a point “A” on the backrest on the same horizontal level as the shoulder of the smallest manikin at a point 2 cm inside the outer edge of the arm. All internal surfaces above the horizontal plane passing through point A, shall be tested in accordance with Annex 17. This area shall**

include the backrest and side wings, including the inner edges (zone of radius) of the side wings. In the case of carry cot devices where a symmetrical installation of the dummy is not possible according to the device and manufacturer instructions, the area complying with Annex 17, shall be all internal surfaces above a point “A”, as previously defined, in the head direction, when measured with this dummy in the carry cot in its worst position consistent with the manufacturer instructions and the carry cot positioned on the test bench.

If a symmetrical installation of the dummy in the carry cot may be possible, the whole inner area shall comply with Annex 17.”

B. JUSTIFICATION

Based on the procedure described in document ECE/TRANS/WP.29/1059 concerning:

“RESOLVING INTERPRETATION ISSUES AND REQUIREMENTS FOR THE TECHNICAL SERVICES IN THE FRAMEWORK OF THE 1958 AGREEMENT”

And particularly paragraph 2 alinea (b) and (d):

2. Interpretation anomalies subsequent to approval being granted

In situations where different interpretations exist between Approval Authorities, but subsequent to an approval being issued the following procedures shall be followed.

In the first instance, the Approval Authorities concerned shall seek to resolve the issue by mutual agreement. This will require liaison and for each Contracting Party to review the procedures used to test and approve the vehicle/equipment/part being disputed. The following guidance will be adopted:

(a) In the event of an error being acknowledged by the Approval Authority, the Approval Authority shall take an action in accordance with the provisions of the 1958 Agreement, and in particular Article 4.

(b) Where agreement is reached which necessitates a new or different interpretation of existing practice (by either Approval Authority), then this shall be communicated to other Contracting Parties applying the Regulation concerned as a matter of urgency. The other Parties shall have 14 days to comment upon the decision, following which the Approval Authority, having taken account of any comments received, can issue approvals in accordance with the new interpretation.

(c) Where agreement cannot be reached, then the Approval Authorities concerned shall seek further review by the arbitration process of Article 10 of the 1958 Agreement.

(d) In any event, the matter shall be brought to the attention of an appropriate subsidiary Working Party. If deemed necessary, the subsidiary Working Party shall submit to WP.29 a suitable regulatory amendment.

France submits this proposal of amendment after discussion and agreement inside the Technical Service Group on the interpretation on how to conduct the test for energy absorption.