Proposal for draft amendments to Regulation No. 107 (M_2 and M_3 vehicles)

I. Proposal

Annex 3, paragraphs 7.6.5. to 7.6.5.1.8., amend to read:

- "7.6.5. Additional technical requirements for power-operated service doors
- 7.6.5.1. In the event of an emergency, every power-operated service door shall be capable, when the vehicle is stationary or driving at a speed less than or equal to 5 km/h, of being opened from inside and, when not locked, from outside by controls which, whether or not the power supply is operating:
- 7.6.5.1.1. override all other door controls;
- 7.6.5.1.2. in the case of interior controls, are placed on, or within 300 mm of, the door, at a height (except in the case of interior controls for the door referred to in Annex 8, paragraph 3.9.1) of not less than 1,600 mm above the first step;
- 7.6.5.1.3. can be easily seen and clearly identified when approaching the door and when standing in front of the door and, if additional to the normal opening controls, be clearly marked for emergency use;
- 7.6.5.1.4. can be operated by one person when standing immediately in front of the door:

7.6.5.1.5. may activate a starting prevention device;

- 7.6.5.1.6.5. cause the door to open to a width that the gauge as defined in paragraph 7.7.1.1. can pass through within 8 seconds after the operation of the control, or enable the door to be easily opened by hand to a width that the gauge as defined in paragraph 7.7.1.1. can pass through within 8 seconds after the operation of the control;
- 7.6.5.1.7.6. may be protected by a device which can be easily removed or broken to gain access to the emergency control; the operation of the emergency control, or the removal of a protective cover over the control, shall be indicated to the driver both audibly and visually, and
- 7.6.5.1.8.7. in the case of a driver-operated door which does not comply with the requirements of paragraph 7.6.5.6.2., shall be such that after they have been operated to open the door and returned to their normal position, the door will not close again until the driver subsequently operates a closing control.
- 7.6.5.1.9.8. The doors shall be prevented from opening if the vehicle moves at a speed higher than 5 km/h."

II. Justification

The current text of Regulation No. 107 is open to different interpretations as to whether a link between the required emergency control of power operated service doors and the voluntarily fitted starting prevention device or halt brake would be allowed or not. If a link were installed, the operation of the emergency control by a passenger would activate the starting prevention device at speeds below 5 km/h, thus bringing the vehicle to a controlled stop and fixing it in its position, ensuring a safe evacuation.