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| Submitted by the expert from Germany | Informal document **GRSG-104-08**  (104th GRSG, 15–19 April 2013  agenda item 2(a)) |

**Proposal for amendments to UN Regulation No. 107  
(M2 and M3 vehicles) – Low floor vehicles**

The text reproduced below has been prepared by the expert from Germany to clarify a requirement for low floor vehicles. The modifications to the current text of the Regulation are marked in bold for new or strikethrough for deleted characters.

I. Proposal

*Annex 8, paragraph 3.1.,* amend to read:

"3.1. Steps

The height of the first step from the ground of at least one service door shall not exceed 250 mm for vehicles of Class I and A and 320 mm for vehicles of Class II, III and B. In the case where only one service door meets this requirement there ~~must~~ **shall** be no barrier or sign which prevents that door from being used as both an entrance and an exit.

As an alternative for vehicles of Class I and A, the first step from the ground shall not exceed 270 mm in two door openings, one entrance and one exit.

**In low floor vehicles a**~~A~~ kneeling system ~~and/or retractable step~~ may be engaged.

**In other vehicles either a kneeling system and/or a retractable step may be used.**

The height of steps in an access passage at the above-mentioned door(s), and in the gangway, shall be not more than 200 mm for vehicles of Class I and A and 250 mm for vehicles of Class II, III and B.

The transition from a sunken gangway to a seating area shall not be considered to be a step."

II. Justification

Low floor vehicles are generally considered as particularly user friendly, especially with regard to the accessibility for passengers with reduced mobility. To enter a low floor bus is specifically associated with only one single step from the ground into the low floor area.

It seems necessary to clearly state that any equipment counteracting this consideration shall not be allowed.

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