

GENERAL COMMENTS  
to the new, unified bus regulation, Reg.107/Rew.1.  
(made by Hungary)

OICA produced the informal doc. No.10 (82<sup>nd</sup> GRSG meeting) as the first draft of the unified bus regulation.

This draft defines the bodywork as a separate technical unit (STU) and it allows to approve the bodywork independently from a chassis. It also allows to approve a “vehicle fitted with a bodywork already approved as a STU.”

This principle and practice is excellent and works well if the STU is independent from the structure in which it is installed (e.g. engine, seat, windscreen etc.) In this case the UTS may be approved separately, independently and only the requirements of the installation shall be checked in the vehicle.

The bodywork is not an independent UTS. May be it used to be in the years 1920-1930, but it is not an independent part of a bus anymore in the last 30 years. The installation of a bodywork onto a chassis is much more than using some bolts (or other connecting elements) to fix a “box” on the chassis. The chassis have different main parameters, geometry, structural arrangements, therefore to adapt a bodywork construction (design) to a given chassis means to modify a lot of smaller or more important details.

Adopting a bodywork design to a certain chassis, the following parameters and characteristics are questionable, which have importance regarding to the approval:

- geometry: step heights and arrangements  
gangway above the axles  
seat spacing and arrangement  
access to the doors and exits, etc.
- passenger capacity: number of standees (and seats?)
- masses: curb mass and belonging axle loads  
total mass and belonging axle loads
- position of centre of gravity
- protection against fire risk: engine compartment and its isolation, fuel filler holes,  
electrical wiring, materials, etc
- strength of the superstructure: it is impossible to test it on a UTS
- stability test: it is impossible to do it on the bodywork alone.
- manoeuvrability: questionable to test it

Therefore Hungary proposes to delete the concept of the “Bodywork as a UTS” from the unified regulation. It means to delete from the text all the belonging paragraphs, also delete Sub-Appendix 1 and Sub-Appendix 3 (or explain, when to use it)