

Transmitted by the Expert from the Russian Federation

Regarding the tests of the vehicles with capacity up to 12 passenger seats corresponding to prescriptions of Regulation No. 52 the Technical services and vehicle manufacturers have the following question:

- Paragraph 5.2.1.3 (area available for passengers), and also paragraph 5.7.8.1. of Regulation No. 52 concerning free space above places for the seated passengers of buses (to which paragraph 5.7.1.9. applies) permits the reduction of free space from the floor, where the feet of the seated passenger rest, from 135 cm to 120 cm. The minimum clearance from the highest point of the undepressed cushion should be 90 cm.

According the paragraph 5.7.8.3 the height of the undepressed seat cushion from the floor up to the upper point of seat cushion is between 40 and 50 cm, if the seats are not located on wheel arches).

The sum of two obligatory minimum dimensions is 130 cm (90 + 40), that does not allow for vehicles (which have up to 12 passenger seats) to reduce this dimension to 120 cm.

In this respect the expert from the Russian Federation would like to have explanation about these requirements and the applications of the prescriptions of paragraph 5.7.8.1. in other countries. The expert from the Russian Federation proposed the following amendment to Regulation No. 52.

Paragraph 5.7.8.1., amend to read:

"5.7.8.1. Over each seating position and its associated foot space, there shall be measured a free space with a height of not less than 90 cm, measured from the highest point of the uncompressed seat cushion and at least 135 cm from the mean level of the floor in the foot space. In the case of vehicles to which paragraph 5.7.1.9 applies, **and also for the first row of seats, these values may be reduced to 120 cm, measured from the floor, where the feet of the seated passenger rest.**"

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