

PROPOSED REFINEMENTS TO THE DRAFT GTR CONCERNING
DOOR LOCKS AND DOOR RETENTION COMPONENTS

(Document TRANS/WP29/2004/69)

Transmitted by the experts from OICA

OICA welcomes and strongly supports this very first Global Technical Regulation, as developed in the framework of GRSP.

Nevertheless, OICA would like to suggest some small refinements to document TRANS/WP29/2004/69, which do not in any way change the content of the GTR. The proposed refinements are as follows:

1. Preamble, Item V (Regulatory Impact and Economic Effectiveness): the last paragraph should be deleted.

This paragraph exclusively deals with the quoted combination test, which is not part of the GTR.

GRSP agreed to further study this matter in order to come with a better and more realistic test, which might be included in a future amendment to the GTR. As the intention of the preamble is to provide a historical reference to the reasons for and background to the GTR, it would be misleading to include this paragraph at this stage. If this, or an equivalent test is added in a future amendment, the background and justification could be added to the preamble at that stage. .

Should this deletion not be acceptable, then the paragraph should at least be reworded in such a way that it does not imply that the combination test is included in the GTR. The following text could be suggested to replace the complete last paragraph:

"A combination test, designed to address door openings that are due to simultaneous forces acting between the latch and striker in offset crashes, may be possible and could be added at a later date when a suitable test device and procedure has been established. No existing tests account for compressive longitudinal loading with a tensile lateral force, even though such loading is relatively common in crashes. It is anticipated that such a requirement, if feasible, would be relatively inexpensive."

2. Text of the Regulation, Item 3.1, amend to read: "Auxiliary Door Latch" is a latch equipped with a fully latched position **but no secondary latch position** and fitted to a door or door system equipped with a primary door latch system."

Without this correction, the existing definition would mean that any latch that incorporates a fully latched position is automatically an auxiliary door latch, and this results in a primary door latch being an auxiliary door latch. Obviously, the existing text therefore needs clarification.

3. Annex 1, Figure 1-4: the arrow of load test 1 should be reversed, as it points to the wrong direction (compression), while this load test 1 is a tension test.