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agenda item 4.3.)

PROPOSAL FOR DRAFT SUPPLEMENT 3 TO THE 01 SERIES OF AMENDMENTS
TO REGULATION No. 80

(Strength of seats and their anchorages (buses))

Transmitted by the expert from the International Organization of Motor Vehicle Manufacturers
(OICA)

Note: The text reproduced below was prepared by the expert from OICA. It proposes clarification of the scope of Regulation No. 80. The proposal is based on a document without a symbol (informal document No. GRSG-89-31) distributed during the eighty-ninth session of GRSG.

Note: This document is distributed to the Experts on General Safety Provisions only.

A. PROPOSAL

Paragraph 1. and footnote */, amend to read:

"1. SCOPE

1.1. This Regulation applies to:

- seats for forward facing installation in vehicles of Categories M2 and M3, of Classes II, III and B 1/;
- vehicles of Categories M2 and M3 of Classes II, III and B (1) in respect of their seat anchorages and seat installation.

1.2. As an alternative to this Regulation and at the request of the manufacturer, vehicles of Category M2 (with the exception of vehicles where one or more seats benefit from the derogation provided in paragraph 7.4. to Regulation No. 14) may be approved to Regulation No. 17.

1/ As defined in the Consolidated resolution on the Construction of vehicles (R.E.3), Annex 7 as amended (TRANS/WP.29/78/Rev.1/Amend.4)."

Paragraph 2.20., reference to footnote 1/ and footnote 1/, renumber as footnote 2/.

Paragraph 4.5.1., reference to footnote 2/, and footnote 2/, renumber as footnote 3/ and amend to read:

"3/ 1 for Germany, 2 for France, 3 for Italy, 4 for the Netherlands, 5 for Sweden, 6 for Belgium, 7 for Hungary, 8 for the Czech Republic, 9 for Spain, 10 for Serbia and Montenegro, 11 for the United Kingdom, 12 for Austria, 13 for Luxembourg, 14 for Switzerland, 15 (vacant), 16 for Norway, 17 for Finland, 18 for Denmark, 19 for Romania, 20 for Poland, 21 for Portugal, 22 for the Russian Federation, 23 for Greece, 24 for Ireland, 25 for Croatia, 26 for Slovenia, 27 for Slovakia, 28 for Belarus, 29 for Estonia, 30 (vacant), 31 for Bosnia and Herzegovina, 32 for Latvia, 33 (vacant), 34 for Bulgaria, 35 (vacant), 36 for Lithuania, 37 for Turkey, 38 (vacant), 39 for Azerbaijan, 40 for The former Yugoslav Republic of Macedonia, 41 (vacant), 42 for the European Community (approvals are granted by its Member States using their respective ECE symbol), 43 for Japan, 44 (vacant), 45 for Australia, 46 for Ukraine, 47 for South Africa, 48 for New Zealand, 49 for Cyprus, 50 for Malta and 51 for the Republic of Korea. Subsequent numbers shall be assigned

B. JUSTIFICATION

In the European Union (EU) there is a single Directive 74/408/EEC (as amended). In the UNECE there are two Regulations Nos. 17 and 80. This difference causes some of the problems in TRANS/WP.29/GRSG/2005/25.

Both the EU and ECE texts recognize that M2 is a mixed regime for vehicle construction (small van-based as M1/N1 and body-built as M3) and thus the Regulations reflect this (Regulations Nos. 17 or 80 for M2, Regulation No. 80 for M3).

Regulation No. 80 was developed at a time when belted occupancy was unusual in buses and is based on a seat designed to collapse in a controlled manner to absorb the impact of a passenger behind on the assumption that it is unoccupied because its occupant is already impacting the seat in front. Regulation No. 14 also recognizes that the upper belt anchorage point will move far more on a Regulation No. 80 seat than on an Regulation No. 17 seat.

Regulation No. 17 is based on having as strong a seat back as possible to absorb luggage loads from behind (where relevant) and restrict the movement of the seat belt reference points.

In changing the scope of Regulation No. 80, the European Commission proposes deleting paragraphs 1.2. and 1.3. This is not acceptable, as these clauses take account of the factors mentioned above and align with the equivalent text in Directive 74/408/EEC. OICA retain the objectives of paragraphs 1.2. (the intention is to give manufacturers of M2 vehicles a free choice of complying with Regulation No. 17 or 80 as in Directive 74/408/EEC, as amended) and 1.3. (the intention was to replicate the EU provision which takes account of a conflict between reducing the load on the belted occupant in an impact and the energy-absorbing objective of the Regulation No. 80 seat which was designed for unbelted passengers).

In addition, reference to Regulations Nos. 36 and 52 must be deleted and refer only to R.E.3, which already contains the necessary definitions. This alleviates the need to add references to Regulation No. 107.

The proposal should refer to approval of seats and approval of vehicles in respect of their seat anchorages and seat installation.
