

PROPOSAL FOR DRAFT CORRIGENDUM TO REGULATION No. 80  
(Strength of seats and anchorages in buses)

Correction of Errors in Appendix 1 (Dynamic Tests)

A. PROPOSAL

Appendix 1

- Paragraph 1.2.2.

Paragraph 1.1.3.1.3 referred to in this paragraph should be corrected to paragraph 1.2.

- Paragraph 1.1.2.1.1.

“Less than 500” for the head acceptability criterion HIC should be corrected to “less than 1000”.

- Paragraph 1.1.2.1.2.

“Less than 30g” for the thorax acceptability criterion (ThAC) except for periods totalling less than 3ms should be corrected to “less than 60g”.

B. JUSTIFICATION

a) Paragraphs 1.2. - 1.2.2. in Appendix 1 must be synonymous with the descriptions of paragraphs 1.3.3. - 1.3.5. in Appendix 5. Therefore, paragraph 1.2.2. in Appendix 1 must correspond to paragraph 1.3.5. in Appendix 5, and paragraph 1.3.3. referred to in Appendix 5 must be paragraph 1.2. in Appendix 1 instead of paragraph 1.1.3.1.3. (Error in writing)

b) Generally, the acceptability criteria in dynamic tests to avoid injury are less than 1000 for the HIC and less than 60g for the ThAC as adopted in FMVSS 208 and other regulations. Therefore, the criteria in Appendix 1 are considered incorrect because of inconsistency in adopting standards of other regulations. For example, in Appendix 6, as the deceleration for the impact absorption test, the standard in paragraph 2.1., Annex 4 of ECE R21 is adopted. This standard value, 80g, is also used in paragraph 5.4.2.1. of ECE R17. If injury criteria, such as concussion-occurrence levels, and the deceleration standard set out in ECE R80 are the same as those in the FMVSS, ECE R21 and R17, then, the HIC and ThAC values should also be harmonized for the purpose of consistency.

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