

**Proposal for draft amendments to the 03 series of amendments  
to Regulation No. 11 (door latches and hinges)**

**A. PROPOSAL**

Paragraph 6.1.3, amend to read:

"6.1.3 Load Test Three (**applicable only to back doors that open in a vertical direction**)"

Paragraph 6.3.2.1, amend to read:

"6.3.2.1. ~~Based on a determination by each Contracting Party or regional economic integration organization, the~~ **The** locking device may be a:  
(a) child safety lock system, or  
(b) lock release/engagement device located within the interior of the vehicle and readily accessible to the driver of the vehicle or an occupant seated adjacent to the door.

Annex 3, paragraph 2.3, amend to read:

"2.3. Load Test Three (**only for back doors that open in a vertical direction** ~~only~~)"

Annex 3, figure 3-3, amend to read:

"Figure 3-3 - Door Latch – Tensile Testing Fixture for Load Test Three (**only for back doors that open in a vertical direction** ~~only~~)"

Annex 4, paragraph 2.3.3.5, amend to read:

"2.3.3.5. Vertical Setup 1. (Only for back doors **that open in a vertical direction**). Orient the door subsystem(s)..." (remainder unchanged)

Annex 4, paragraph 2.3.3.6, amend to read:

"2.3.3.6. Vertical Setup 2. (Only for back doors **that open in a vertical direction**). Orient the door subsystem(s)..." (remainder unchanged)

Annex 5, paragraph 1, amend to read:

"1. Purpose

These tests are conducted to determine the ability of the vehicle hinge system to withstand test loads in the longitudinal, transversal, and, **only for back doors that open in a vertical direction**, vertical vehicle directions."

Annex 5, paragraph 2.1.3, amend to read:

"2.1.3 Vertical load test (Backdoors **that open in a vertical direction** only)"

Annex 6, paragraph 4.1, amend to read:

"4.1. Move each force application device at any rate ..... until either force application device reaches a total displacement of 300 mm.  
**However, if the force is applied at a faster rate and the test requirements are fulfilled, then the test shall be considered valid."**

## **B. JUSTIFICATION**

The above OICA proposals are to be seen in addition to informal document GRSP-42-07, submitted by the EC and aiming at harmonising UNECE Regulation No. 11 with the latest developments of gtr No. 1.

OICA supports this alignment and suggests the following additional clarifications.

The additional third load test in the orthogonal direction applies only to door latches and hinges of back doors that open in a vertical direction. FMVSS 206 has already transposed the gtr No. 1 and this limited application is clearly taken into account (see S 4.1.2.1(d)(3) in FMVSS206 - 72FR5399 06/Feb/2007). It is therefore proposed to clarify the various paragraphs where this Load Test Three is referred to.

In addition, the vertical setup for the inertial test procedure (see Annex 4) applies only to door latches of back doors that open in a vertical direction. FMVSS 206 has already transposed the gtr No.1 and this limited application is clearly taken into account (see S5.1.1.4 (b) (2) (ii) (E) and (F) in FMVSS206 - 72 FR 5399 dated 06/Feb/2007). It is therefore proposed to clarify this in UNECE Regulation No. 11 as well.

As concerns paragraph 6.3.2.1 regarding rear side doors, UNECE Regulation No. 11 literally copied the corresponding text of gtr No. 1. The text of gtr 1 allows each Contracting Party / Regional Economic Organization to choose the type of locking device for rear side doors (i.e. child safety lock or lock release/engagement device), because no harmonised could be found in developing gtr No. 1. This text was however erroneously transposed in the framework of the 1958 Agreement, resulting in a potentially non-harmonised situation within the 1958 Agreement. It is therefore proposed to correct this slight mistake and to ensure that both systems, considered to be of equivalent safety, are allowed.

Finally, the wording "up to 2,000 N per minute" aims at harmonising UNECE Regulation No. 11 with the current text in FMVSS206.

This rate of up to 2,000 N per minute however leads to an application time of minimum 4.5 minutes, which still is quite a long time. It is therefore proposed that the manufacturer should be allowed to request that the test is performed in a shorter time.

Finally, the issue of the load rate is addressed in informal document GRSP-42-07, submitted by the EC, proposing a rate of "up to 2,000 N per minute"; this aims at harmonising UNECE Regulation No. 11 with the expected text of gtr 1, when aligned with the latest status of FMVSS 206.

This rate of up to 2,000 N per minute however leads to an application time of minimum 4.5 minutes. OICA consequently suggests that when the test is performed in a shorter time and all requirements are met, this test should be considered as valid.

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