

REGULATION No. 107 (M₂ and M₃ vehicles)

Comments and proposal to document ECE/TRANS/WP.29/GRSG/2009/15 (proposals for further amendments to Regulation No. 107)

A. PROPOSAL

Annex 8, paragraph 3.2.6., amend to read:

"3.2.6. The foot space at priority seating positions shall extend forward of the seat from a vertical plane through the forward edge of the seat cushion. The foot space shall not have a slope in any direction of more than 8 percent. **For vehicles of Classes I, A and II, the vertical distance between the floor of the seating area and the adjacent gangway shall not be more than 250 mm.**"

B. JUSTIFICATION

The transition from a sunken gangway to a seating area is not considered to be a step. The vertical distance between the gangway surface and the floor of a seating area can be up to 350 mm. Such a high step can prevent passengers of reduced mobility from accessing the priority seats. We agree with document ECE/TRANS/WP.29/GRSG/2009/15 that this situation is not appropriate.

Our proposal aims to reduce the maximum permitted vertical distance between the foot space of a priority seat and the surface of the adjacent gangway to a reasonable level for passengers of reduced mobility. A step height of 250 mm is allowed in the entrance steps of vehicles of Class I and A. It is logical to allow the same height between the foot space of a priority seat and the surface of the adjacent gangway.

Research in Sweden shows that people of reduced mobility use, in principle, two different ways of approaching a bus seat that is placed adjacent to a sunken gangway; a) they climb the step and move sideways with their back towards the seat and then sit down on the seat, or b) they stand in the gangway with their back towards the seat and sit down on the seat, then they turn and lift up their legs on to the floor at the seat. Those people who sit down on the seat from a standing position in the gangway have advantage of the higher seat height when they sit down or rise.

Many low floor vehicles of Class I, A and II in Sweden have the seats mounted on a floor that is about 250 mm above the gangway surface. The bus manufacturers use the space under the floor for fuel tanks and other equipment. To reduce this floor height would mean a costly re-design of several bus models but would not give any noticeable advantages for passengers of reduced mobility.

The experiences in Sweden show that many persons of reduced mobility, e.g. elderly persons, use low floor buses and they do not have problems with the steps in those buses. In fact during the shopping hours they are a majority of the passengers. They also use other seats than priority seats without any problems.