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Regulation No. 107 (M₂ and M₃ vehicles) – Requirements for service doors, windows and emergency exits

Proposal for amendments to Regulation No. 107

Submitted by the expert from the Russian Federation *

The text reproduced below was prepared by the expert from the Russian Federation to align the different language versions of Regulation No. 107 with regard to the obligatory synchronized operation of retractable steps and doors. It is based on informal document GRSG-97-07. The modifications to the current text of the Regulation are marked in bold or strikethrough characters.

* In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

A. Background

1. The Russian text of paragraph 7.6.10.1. of Annex 3 to Regulation No. 107 contains the provision concerning the obligatory synchronized operation of the retractable steps and the doors (“They shall be duly retracted and extended simultaneously with closing and opening of the corresponding service or emergency door”), which formally does not correspond with the English text of that paragraph which does not contain any obligatory provisions concerning the synchronized operation of the doors and the retractable steps (“the operation of retractable steps may be synchronized with that of the corresponding service or emergency door”).
2. Regulation No. 36 prescribes that the doors and any retractable steps shall operate synchronously (paragraph 5.6.10.1.: “Their operation shall be synchronized with that of the corresponding service or emergency door”).
3. Regulation No. 52 prescribes that the doors and the retractable steps shall operate synchronously only if the retractable steps are power-operated (paragraph 5.6.10.1.: “If power-operated, their operation shall be synchronized with that of the corresponding service or emergency door”).
4. According to Directive 2001/85/EC the synchronous operation of the doors and the retractable steps is not obligatory (paragraph 7.6.10.1.: “the operation of retractable steps may be synchronized with that of the corresponding service or emergency door”).
5. Thus, in the process of evolution of the general provisions for bus safety (from Regulations Nos. 36 and 52 to Directive 2001/85/EC and then to Regulation No. 107) the requirement concerning the obligatory synchronized operation of the retractable steps and the doors has disappeared (at least in the English version of Regulation No. 107).
6. **The question to the experts is as follows:** as the danger for passengers to be injured while the retractable steps are in operation still exists, would the esteemed experts consider it necessary to restore the related provision in Regulation No. 107?

B. Proposal

7. The Russian Federation experts have five options of proposals for the above-mentioned issue (listed in the priority order):

Option 1: to include the corresponding amendments to Regulation No.107 based on Regulation No. 52, namely, synchronized operation of the doors and the retractable steps shall be provided only if they are power-operated (since the steps operated manually are practically safe):

Annex 3, paragraph 7.6.10.1., amend to read:

“7.6.10.1. **If power operated, their operation shall be synchronized with that of the corresponding service or emergency door;**”

Option 2 (It has a lower priority since it involves complication of the design of the step actuator): to limit the forces of the extending steps which may affect a passenger analogously to the supplemental provisions for power-operated doors and ramps (see paragraphs 7.6.5.6.1.1. of Annex 3 and 3.11.4.3.3. of Annex 8 to Regulation No. 107). The values of the reactive forces in this case may be determined according to the guidelines given in Annex 6 to Regulation No. 107.

Option 3: to introduce a provision into Regulation No.107, according to which the power-operated step shall not be extended after the door opens and it shall not be retracted before the door closes):

Annex 3, paragraph 7.6.10.1., amend to read:

“7.6.10.1. the power-operated retractable step shall not be extended after opening and shall not be retracted before closing of the corresponding service or emergency door;”

Option 4: to bring the Russian text of paragraph 7.6.10.1. of Annex 3 in accordance with the English text:

Annex 3, paragraph 7.6.10.1. (the Russian text only), amend to read:

“7.6.10.1. ~~они должны надлежащим образом убираться и выдвигаться работа убирающихся ступенек может быть синхронизирована одновременно с закрыванием и открыванием соответствующей служебной или запасной двери;~~”

Option 5: as the English version of paragraph 7.6.10.1. of Annex 3 contains no an obligatory provision and, in fact, may be considered as a recommendation, maybe this paragraph should be deleted from Regulation No.107, 02 series of amendments?
