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**Economic Commission for Europe**

Inland Transport Committee

**World Forum for Harmonization of Vehicle Regulations**

Working Party on General Safety Provisions

**Ninety-ninth session**

Geneva, 19–22 October 2010

Item 3(a) of the provisional agenda

**Regulation No. 107 (M<sub>2</sub> and M<sub>3</sub> vehicles) – Proposals for further amendments****Proposal for Supplement 2 to the 03 series of amendments to Regulation No. 107****Submitted by the expert from Sweden, the International Association of the Body and Trailer Building Industry and the International Organization of Motor Vehicle Manufacturers\***

As agreed during the ninety-eighth session of the Working Party on General Safety Provisions (GRSG), the text reproduced below was prepared by the experts from Sweden, the International Association of the Body and Trailer Building Industry (CLCCR) and the International Organization of Motor Vehicle Manufacturers (OICA) in order to exclude vehicles of Class II from the amendment proposed by ECE/TRANS/WP.29/GRSG/2010/3 and to introduce transitional provisions. The modifications to the current text of the Regulation are marked in bold for new characters.

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\* 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.

## I. Proposal

*Insert new paragraphs 10.16. to 10.18., to read:*

- “**10.16.** As from the official date of entry into force of the Supplement [2] to the 03 series of amendments, no Contracting Party applying this Regulation shall refuse to grant approval under this Regulation as amended by the Supplement [2] to the 03 series of amendments.
- 10.17.** As from 24 months after the date of entry into force of the Supplement [2] to the 03 series of amendments, Contracting Parties applying this Regulation shall grant approvals only if the vehicle type to be approved meets the requirements of this Regulation as amended by Supplement [2] to the 03 series of amendments.
- 10.18.** As from 36 months after the entry into force of Supplement [2] to the 03 series of amendments, Contracting Parties applying this Regulation may refuse to grant national/regional approvals and first national registration (first entry into service) of a vehicle which does not meet the requirements of Supplement [2] to the 03 series of amendments to this Regulation.”

*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 and A, the vertical distance between the floor of the seating area and the adjacent gangway shall be not more than 250 mm.**”

## II. Justification

1. 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 with reduced mobility from accessing the priority seats. We agree with document ECE/TRANS/WP.29/GRSG/2009/15 that this situation is not appropriate.
2. 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.
3. 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.
4. Many low floor vehicles of Class I and A 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 components of the braking and suspension systems, fuel tanks and

other equipment. To significantly reduce this floor height would mean a costly re-design of several bus models with the risk of safety critical parts being located in vulnerable positions, but without giving any noticeable advantages for passengers with reduced mobility.

5. Appropriate transitional provisions have been introduced to give manufacturers sufficient time to introduce the necessary modifications to buses which have a transition from a sunken gangway to a seating area exceeding 250 mm.

6. 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 represent the majority of the passengers. They also use seats other than priority seats having a higher step without any problems.

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