Proposal for amendments to Regulation No. 107 (M₂ and M₃ vehicles)

Addendum 106: Regulation No. 107 Revision 2 - Amendment 3 - Supplement 5 to the 02 series of amendments:

A. Proposal

*Annex 3, paragraph 7.7.14.7.*, amend to read:

> 7.7.14.7. The seat shall be adjustable in its longitudinal and vertical positions and in its seat back inclination. It shall lock automatically in the selected position and, if fitted with a swivelling mechanism, it shall lock automatically when in the driving position. The seat shall be equipped with a suspension system.

> 7.7.14.7.1. The suspension system and the vertical position adjustment are not mandatory for vehicles of Class A or B."

B. Justification

1. Approval regulations should only deal with essential matters of safety for the driver, passengers and other road users. They should not deal with comfort or typical usage. A suspension seat for the driver should not therefore be mandatory.

2. A survey of drivers suggests that they have less control over the speed and braking of a bus when traversing traffic calming measures when seated on a "suspension" seat in comparison with a static seat without an air or hydraulic system. Passengers are therefore at greater risk of injury due to a less smooth ride.

3. Drivers are not at risk of exceeding the maximum exposure for whole body vibration during a typical shift. Therefore a static seat is adequate.

4. Suspension seats cost more to buy and maintain than static seats.