Further to the 5th Informal UNECE Noise Quiet Road Transport Vehicles Working Group meeting (GRB-QRTV WG), and, in view the 53rd UNECE Noise Plenary Session discussion (53rd GRB), the European Association of Automotive Suppliers, CLEPA, wishes sharing thoughts with the GRB and GRB-QRTV WG Delegates and Experts about Sound locatability, see reference (1).

The criteria “sound location” currently appears in the United States of America’s Official Documents (2) and comments, by stakeholders, about these Official Documents, see references (3) to (6).

However, at the outset of the 5th Informal UNECE GRB-QRTV WG meeting, CLEPA’s Delegates were very concerned by what seemed the prior omission of any reference in the working group’s document to sound source location.

Moreover, it was unfortunate that CLEPA’s presentation on locatability, see reference (1), had been scheduled to come after completion of work on the working group’s document.

As the 5th Informal UNECE GRB-QRTV WG meeting minutes (QRTV-05-07 Para. 8.2) might mislead readers consulting the UNECE documents, and, in the light of the referenced documents CLEPA urgently requests the reinsertion of the reference to sound source location prior to further discussions within the Informal UNECE GRB-QRTV WG and during the 53rd UNECE GRB Plenary Session.

Justifications:

To support its request, CLEPA quotes, here after, the referenced documents; open quotes:

1. USA House of Representatives 734, Pedestrian Safety Enhancement Act 2009
   Sec 4(a)(3)(A) A) which method provides blind and other pedestrians the greatest amount of information regarding location, motion, speed … (N.B. “location” is first in this list)

2. USA S. 841 (111th) Pedestrian Safety Enhancement Act of 2010:
   a. Sec 2 (2) DEFINITIONS; “the term ‘alert sound’ (herein referred to as the ‘sound’) means a vehicle-emitted sound to enable pedestrians to discern vehicle presence, direction, location …”
   b. Sec 3 MINIMUM SOUND REQUIREMENT FOR MOTOR VEHICLES. (a) (1) establishing performance requirements for an alert sound that allows

3. World Blind Union letter Mr. Kenneth Feith U.S. EPA Headquarters RE Japanese Guidelines dated September 16th 2010 … “The World Blind Union (WBU) strongly believes that any standards mandating vehicle sound must be based on scientific study of the volume and characteristics of the sound needed to alert pedestrians to the presence, location, speed, and direction of vehicles.”

4. Disabled World; “Key Stake Holders Agree on Measures to Protect Blind Pedestrians form Silent Cars”; “… blind pedestrians cannot locate and evaluate traffic …”
5. NFB; “President Signs Pedestrian Safety Enhancement Act”; “… blind pedestrians cannot locate and evaluate ….”.

6. Traffic Technology Today “NFB pushing for Electric Vehicle Safety Legislation”; “… Information about location, motion, ….”.

From the above, it is clear that “location” is a fundamental ingredient of Quiet Road Transport Vehicles’ pedestrian safety.

References:

(1) CLEPA Document QRTV-05-06 – Sound locatability tests – Comparative Locatability tests of warning signals (http://www.unece.org/trans/doc/2011/wp29grb/QRTV-05-06e.pdf);

(2, 3, 4, 5, 6 and 7)