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Economic Commission for Europe**Inland Transport Committee****World Forum for Harmonization of Vehicle Regulations****Working Party on General Safety Provisions****100th session**

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Item 3(a) of the provisional agenda

Regulation No. 107 (M₂ and M₃ vehicles) – Proposal for further amendments**Proposal for amendments to Regulation No. 107 (M₂ and M₃ vehicles)****Submitted by the expert from the International Road Transport Union***

The text reproduced below was prepared by the expert from the International Road Transport Union (IRU) to allow driver seats with no suspension system. It is based on informal document No. GRSG-99-22, distributed at the ninety-ninth session of the Working Party on General Safety provisions (GRSG). The modifications to the current text of the Regulation are marked in bold for new or strikethrough for deleted characters.

*In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106 and ECE/TRANS/2010/8, 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

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~~ **is** not mandatory for vehicles of Class A or B."

II. 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 than when seated on 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.
