

## **Comments from the United States on ECE/TRANS/WP.29/GRSP/2013/25**

1. The cited document proposes to amend the UN Global Technical Regulation No. 9 on pedestrian safety by introducing the flexible pedestrian legform impactor (FlexPLI) as a single harmonized test tool in order to enhance the level of protection for pedestrian lower legs. The FlexPLI is replacing the European Enhanced Vehicle Safety Committee (EEVC) lower legform impactor due to its superior biofidelity at the component and assembly level.
2. The new changes introduced by this amendment are the following:
  - a. The introduction of the flexible pedestrian legform impactor.
  - b. The introduction of new dynamic certification corridors.
  - c. The introduction of new static certification corridors.
  - d. The process of using an assessment interval for identifying maximum measurements.
3. Paragraph 200 of Part A, statement of technical rationale, states that two different approaches to derive injury threshold values were used in this proposal. One proposed by Germany and another one proposed by Japan. A brief explanation of the assumptions made by both approaches is included in the following paragraphs. Although Germany and Japan have tried to a great extent to address NHTSA's questions and concerns on each methodology utilized to derive injury risk functions and threshold values, the proposal submitted to GRSP does not include this information. For this reason, we request to add a reference, within Part A of this proposal, to a document that explains both approaches in detail. This document should include all injury risk functions and assumptions made.
4. Paragraph 5.1.1 of Part B, presents the injury assessment reference values (IARVs) for this GTR. The US cannot agree with these values until our cost benefit analysis is completed. We previously suggested including the injury risk curves only, with Contracting Parties choosing appropriate IARVs when implementing this GTR in national legislation but the IWG rejected the idea. Although language has been added to Part A to address our concerns and IARVs are currently in square brackets - for further discussion -, the US cannot adopt this amendment unless Contracting Parties are allowed to choose IARVs that are cost beneficial to their domestic fleet or the IARVs are kept in between brackets.

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5. Until concerns raised above have been addressed in the text of the draft amendment, the United States cannot support the changes to this GTR.