

## Proposal for amendments to Regulation No. 107 (Buses and coaches)

The text reproduced below has been prepared by the expert of Romania to clarify the requirements regarding the seat spacing.

The modifications to the current text of Regulation are marked in **bold** for new or strikethrough for deleted characters.

### I. Proposal

*Annex 3, paragraph 7.7.8.4.1.*, amend to read:

"7.7.8.4.1. In the case of seats facing in the same direction, the distance between the front of a seat squab and the back of the squab of the seat preceding it (dimension H), shall, when measured horizontally, **parallel to the longitudinal plane of the vehicle** and at all heights above the floor between the level of the top surface of the seat cushion and a point 620 mm above the floor, not be less than:

<i>H</i>	
Classes I, A and B	650 mm
Classes II and III	680 mm

**The distance (dimension H) shall be fulfilled over the zone defined by longitudinal vertical planes 200 mm either side of the median vertical plane of the seating position.**

*Annex 3, paragraph 7.7.8.4.2.*, amend to read:

"7.7.8.4.2. All measurements shall be taken, with the seat cushion and squab uncompressed, ~~in a vertical plane passing through the centreline of the individual seating place.~~

### II. Justification

1. The current text of paragraph 7.7.8.4.2. specifies that the measurements shall be taken in a vertical plane passing through the centreline of the individual seating place.
2. Technical service practice has shown that there are dedicated seats for vehicles M<sub>2</sub> or M<sub>3</sub> for which the backrest configuration lead to fulfilment of the minimum H dimension only in middle seat line or near them, but the real passenger comfort is not assured (see the photos below).



3. The type approval authorities of the member states of the European Union (TAAM) discussed during meetings in 2014 the proper interpretation of the text of the Regulation in case of seats produced with a central recess (sunken area), to comply with dimension H measurement requirement.
4. Type approval authorities decided that the text of the Regulation shall be modified in order to provide an adequate method to measure the H dimension.
5. The text proposed is correlated with the free space over seating positions defined in paragraph 7.7.8.6.2.