

## **Proposal for amendments to UN Regulation No. 107 (M2 and M3)**

Note: The observations reproduced below were prepared by the International Road Transport Union (IRU) to inform the GRSG experts of the road transport sector's point of view concerning the strengthening of requirements to improve the accommodation and accessibility for passengers with reduced mobility to the proposals by Germany (ECE/TRANS/WP.29/GRSG/2016/20 and its Corr.1).

### **I. IRU observations**

IRU observations on the German proposal to amend Regulation No. 107 on improving the accommodation and accessibility for passengers with reduced mobility are the following:

- There is no cost benefit analysis on mandating service door lighting. This should remain an option of customer choice, unless a safety benefit can be justified – fitting external down lights on urban city vehicles seems to unduly reduce environmental performance with little benefit.
- The contrast requirements is recognised as a good concept in a culture where interior colour schemes are becoming progressively more “grey”, but the provision is poorly and complexly written – it allows a yellow or white pole (irrespective of its contrast with the surroundings), or to meet quoted contrast requirements – so it allows a white pole against a white background/surrounding. The technical specification of the contrast needs to be improved and probably simplified to make it easier for customers to understand what colours are permitted.
- Section 7.7.15 on audible information assumes an announcement system on the vehicle, but none is mandated in the Regulation – therefore, this provision should be rejected (recognising that if they want to mandate announcement systems this would put a large cost on to vehicles, yet operationally, the announcement systems may never be used).
- The text in 7.11.4.1 does not specify the purpose and position of a handrail in a toilet, so this needs to be defined fully or deleted.
- Section 3.2.4 fitting jack sockets in seats again assumes a fitted announcement system where none is mandated in the Regulation. Cables may block access and egress from Priority seats depending on position of the sockets. The proposal that a speaker adjacent to Priority seats/Groups of Priority Seats would be a more practical solution (provisioned to apply “where announcement systems fitted” only).
- There is no cost benefit analysis or comment on an existing problem that changing the floor slopes is trying to solve. Manufacturers were asked to analyse existing designs to determine whether they would comply, but generally we do not see any justified need to change existing provisions.
- Marking of passenger seats was felt to be a bad idea, as each seat design is different and so would have the markings in different positions - so those with reduced or no sight would need to “feel around the seats” which may cause problems if the seats are occupied. Again, there is no indication there is a problem that this text is intended to address. It would make more sense to introduce a standard seat coding convention (similar to airplanes) which defines seat location by row number and letter, so that position of seating is intuitive for all users.

### **II. Justification**

The revised proposal by Germany to insert new amendments might create an additional burden on road transport operators without increasing road safety.

IRU cannot support the German proposal and thinks that it would be more appropriate to address the issue with a cost benefit analysis, where the safety benefit can be justified.

The GRSG experts are requested to carefully consider IRU's arguments before making a final decision.

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