

Proposal for the 04 series of amendments to UN Regulation No. 80 (Strength of seats and their anchorages (buses))

Submitted by the expert from OICA *

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I. Proposal

Paragraph 4.3., amend to read:

"4.3. An approval number shall be assigned to each type approved. Its first two digits (at present ~~03~~ **04**, corresponding to the ~~03~~ **04** series of amendments) ..."

Insert new paragraph 5.5., amend to read:

"5.5 **Static test in Appendix 5 is not permitted if the seat is attached to the vehicle structure by means of any clamping without mechanical fixation. Mechanical fixation means a positive locking fixation of the seat that prevents the seat from moving in the driving direction.**

Renumber former paragraph 5.5. with 5.6

Insert new Paragraphs 12.10 to 12.14, to read:

- "12.10. **As from the official date of entry into force of the 04 series of amendments, no Contracting Party applying this UN Regulation shall refuse to grant or refuse to accept UN type-approvals under this UN Regulation as amended by the 04 series of amendments.**
- 12.11. **As from 1 September 2021, Contracting Parties applying this UN Regulation shall not be obliged to accept UN type-approvals to the preceding series of amendments, first issued after 1 September 2021.**
- 12.12. **Until 1 September 2022, Contracting Parties applying this UN Regulation shall accept UN type-approvals to the preceding series of amendments, first issued before 1 September 2021.**
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- 12.13. As from 1 September 2022, Contracting Parties applying this UN Regulation shall not be obliged to accept type-approvals issued to the preceding series of amendments to this Regulation.
- 12.14. Contracting Parties applying this UN Regulation shall not refuse to grant UN type-approvals according to any preceding series of amendments to this UN Regulation or extensions thereof."

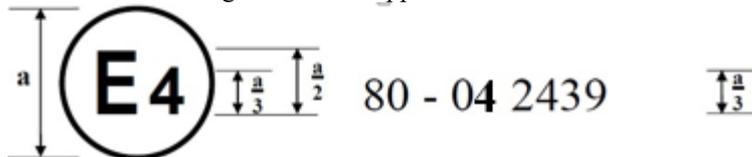
"7. Conformity of production

The conformity of production procedures shall comply with those set out in the Agreement, ~~Appendix 2~~ (Schedule 1 E/ECE/TRANS/505/Rev.3), with the following requirements:"

"Annex 3

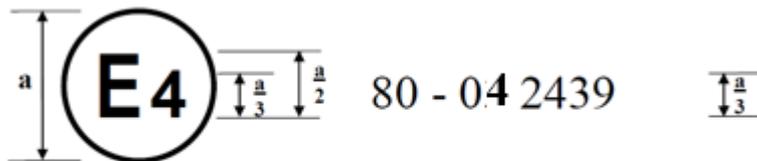
Arrangements of approval mark

1. Arrangement in the approval mark for a seat



The above approval mark affixed to a seat shows that the seat type concerned has, with regard to the strength of the seats, the test being carried out in accordance with paragraph 2 of Annex 4, been approved in the Netherlands (E4) under number 0342439. The approval number indicates that the approval was granted in accordance with the requirements of Regulation No. 80 as amended by the 034 series of amendments.

2. Arrangement in the approval mark for a vehicle type



a = 8 mm min

The above approval mark, affixed to a vehicle, shows that this type of vehicle has been approved in the Netherlands (E4) under number 0342439 with regard to the strength of the anchorages on the vehicle. The approval number indicates that the approval was granted in accordance with the requirements of Regulation No. 80 as amended by the 034 series of amendments."

II. Justification

Not only small manufacturers are concerned with the deletion of appendix 5 for static testing as proposed by Germany, also small projects or class I vehicles (when belts are installed) might benefit from this simpler test method.

The easy or quick attachments of seats in buses are being targeted by the German proposal. And indeed some of these fixations pass the static test, but fail the dynamic test because they clamp the seat in its anchorage in only one direction square to the test direction (otherwise it would not be easy nor quick for replacing seats). The German study did not show however that all other type of attachments have a similar deficiency.

The static test is a well-known and acceptable method (a similar requirement is by the way still in US FMVSS 222 for School bus passenger seating and crash protection). According to the proposal by Germany, it would have to be deleted because it allows for one questionable attachment.

This alternative OICA proposal adds a more stringent requirement for the attachment including the supports and fittings of the seat, preventing the above described easy or quick attachment to be installed. That solves the problem correctly identified by Germany in another way, but leaves the static test method for use by small manufacturers or small volume vehicle types or class I vehicles.
