Comment and question on GRRF Rollover/Ad-hoc Revision
Submitted by Japan

1. Applicable Documents

2. Comment
In order for the regulation concerning vehicle stability against rollover be fair, widely acceptable and technically well-founded, we believe that further discussions will be necessary.

1) Dynamic Stability Limit
*page3
5.3.1.3. Dynamic test and dynamic simulation method:
...lateral acceleration level of $4m/s^2$ measured at the ...
Reasons: Since past discussions have consistently assumed the value of $3.5m/s^2$, the rationales for changing this to $4m/s^2$ must be deliberated including changes in loading and other conditions.

2) Simulation
*page9 Annex6
1.1. Modeling and simulation tool
... tool which is either used by or has been agreed with the type approval or technical service.
Reasons: Regarding simulation models, clear definitions are necessary for each unit (e.g., chassis, suspension and steering) as suggested by the first step equations. Further, a standard for modeling and simulation tools must be universally acceptable and fair to small body makers who are disadvantaged in their abilities to develop new technologies.

3) Question
On the definition of vehicle loading condition
page Annex5 and page10
3 or 4.VEHICLE LOADING CONDITION
specified by the manufacturer taking into account the type of body fitted or expected to be fitted to a vehicle in service.

Question:
Although this is a factor impacting on vehicle characteristics, loading condition as defined by the manufacturer has been adopted and this could possibly vary from
actual market conditions. Practically speaking, how should the definition be applied and how should the results thereof be assessed?