

Informal document No. **GRSG-88-19**
(88th GRSG session, 18-22 April 2005,
agenda item 4.1.)

Original: ENGLISH

**COMMENTS ON THE PROPOSAL FOR A NEW GLOBAL TECHNICAL
REGULATION CONCERNING SAFETY GLAZING MATERIALS FOR
MOTOR VEHICLES AND MOTOR VEHICLE EQUIPMENT**

Transmitted by the Expert from the United States

The United States appreciates the work of the informal GTR group on glazing, and would like to thank Germany for chairing the group.

Regarding the current draft GTR, the U.S. would like to offer the following comments:

1. In order to facilitate the review and adoption of the Draft GTR by the Executive Committee, the format will need to conform to the format specified in document TRANS/WP.29/883 (3 September 2002). The door lock GTR recently established by GRSP provides a good example of a standard that follows the required format. Given our experience with this format, the U.S. is offering to assist the expert from Germany with this task.
2. In the U.S., the statute that gives NHTSA the authority to establish Federal Motor Vehicle Safety Standards requires each standard to meet several substantive criteria. One of the criteria is objectivity. In the case of performance requirements and test procedures, this means that compliance must be determined through the use of scientific measurements instead of subjective human judgement. The U.S. notes that portions of the test procedures outlined in this Draft GTR will need to be more objective before they could be adopted as a regulation in the United States. For example, in Annex 3, section 2.1.3 uses the phrase “care shall be taken to ensure adequate contact...” In this example, in the U.S., we would need to specify some specific limit on how much of the test piece is permitted to not be in contact.

We are not providing a list of specific proposed amendments at this time, as we are concerned that more instances may be discovered as the document is reformatted. We are also hopeful that the process of redrafting will help us arrive at proposals to address some substantive issues that we still have concerns about, such as light transmittance and the edges of the pillars and toughened glass.

The United States expects to be able to complete its reformatting of the document by early summer. We would like to invite the members of the informal group to a meeting in the United States in early June to review the reformatted document, review our recommendations relating to the issue raised in the above paragraph, and to review any other issues raised at this meeting.

A new document would then be ready for submission in time for the deadline for the 89th session.

3. At the last WP.29 meeting, the Executive Committee of the 1998 Agreement requested that a progress report be provided, outlining the status of activities, progress that has been made, outstanding issues to be resolved and a timeline for the development and completion of this GTR. During the summer meeting, and if need be during an informal meeting to take place around the 89th GRSG session, we could discuss all these items and prepare a report and timeline to be given to AC.3 for the November WP.29 meeting.

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