

ARGUMENTS OF THE DISSENTING OPINION TO THE SUMMARY DOCUMENT PROPOSED BY THE MAJORITY OF THE IC/R.66 EXPERT GROUP

1. The Report of the IG/R.66 expert group meeting held in Warsaw (June, 2008) put down that the proposal of the group's majority to GRSG about the extension of the scope of R.66 is presented in the Summary Document and the arguments of the dissenting opinion of the Hungarian expert will be presented separately in an informal GRSG document. These arguments are listed below.
2. **Single deck vehicles not exceeding passenger capacity of 22.**

Beyond the arguments listed in para. 6.1. of the "Summary Document" the following should be also considered:

- Every bus passenger – independently whether travelling on a bus having passenger capacity less or more than 16 – needs the same safety (life protection)
- In Australia and also in South Africa the scope of a similar standard is extended to small buses without any limitation.
- The passenger capacity limit (border) 16 does not have any kind of technical, biometrical, constructional, etc. meaning in respect of the endangerment of passengers.
- The available accident information, data did not provide any evidences to introduce this limitation when extending the scope to small buses.

Therefore the Hungarian expert proposes to GRSG to extend the scope to all small Class B buses independently from their passenger capacity.

3. Double deck (DD) vehicles

Beyond the arguments listed in para. 6.2 of the Summary Document, the following should be also considered:

- Every coach passenger – independently whether travelling on a single deck, high-deck (HD) coach or on a DD coach – needs the same safety level (life protection)
- The existing version of Regulation 66. applies to HD coaches having a total height of 3,9 m, but DD coaches with a total height of 4,0 m are out of the scope. The passengers (passenger compartments) are in similar position in both cases.
- No technical, biometrical, constructional, etc. reasons to distinguish these categories in respect of rollover
- The fleet of double deck vehicles in the total coach fleet is small, but it is not negligible considering only the fleet of the luxury tourist coaches and their population is increasing. The accident information shows that they could be overrepresented in the rollover accidents compared to their fleet representation (because of the higher CG position, weaker lateral stability)

- In the last 10 years, in Europe around 50 rollover accidents of DD vehicles became known. This is twice as much as the number of known bus rollovers when GRSA started to work on the roof strength problem recognizing that it is an essential safety issue. These accidents proved that DD coaches have the same kind of roof strength problem as the other buses and coaches.
- The casualty figures from the accident information show that DD coaches have similar or even worse casualty rates in rollover, than the other categories.

Therefore the Hungarian expert proposes to GRSG to extend the scope of R. 66 not on a voluntary basis to DD coaches, but strongly proposes to do that obligatory.