

**Comments and proposal for amendments to documents
ECE/TRANS/WP.29/GRSG/2012/15 and GRSG-103-29
(draft 06 series of amendments to Regulation No. 107)**

Note: The modifications to the current text of the Resolution are shown in **bold characters**.

I. Comments

1. To the Russian Federation experts' opinion, it would be inappropriate to delete paragraphs 7.7.4.1 and 7.7.4.2 of Annex 3 and fig. 26 of Annex 4 from Regulation № 107, because in some cases the escape hatches in the roof may be the only possibility for escape, and they shall be easily accessible (for example, when in an accident the bus (coach) with the blind rear face of the body remains in its driving position but the side emergency exits become inaccessible: in case of accidents inside tunnels and/or when the side walls are obstructed with neighboring vehicles).

2. In the course of the discussion taken place at the 103rd GRSG session, some of the experts proposed including the requirements with regard to the access to an escape hatch in the roof in the case, when the bus (coach) is overturned on its side.

In our opinion, it would be inappropriate to include any additional requirements into Regulation № 107 with regard to the access to an escape hatch in the roof when the bus (coach) was on its side, since in such a case the access would be provided automatically owing to the width of the bus (coach) which is about 2.5 m and, correspondingly, the maximum distance from the side wall of the body to the lower edge of the escape hatch aperture is:

$$2.5 \text{ m} / 2 - 0.6 \text{ m (the width of the hatch)} / 2 = 0.95 \text{ m.}$$

Thus, the Russian Federation position is that the existing requirements in the actual Regulation № 107 with regard to the access to an escape hatch in the roof are not only requisite but also sufficient.

3. Taking into consideration the above, as well as the fact that the current text of the Annex 3 to Regulation № 107 has no reference to fig. 26 of Annex 4, we only propose to amend paragraph 7.7.4.1 of Annex 3.

II. Proposal

Annex 3, paragraph 7.7.4.1., amend to read:

"7.7.4.1. Escape hatches in the roof (**see Annex 4, Figure 26**)."
