Question to GRSG delegations regarding approval of Class II vehicles with 0 declared standing passengers.

Question that Spanish delegation would like to raise to GRSG delegations regarding UN Regulation No. 107:

Spanish authority has been asked by a manufacturer about the possibility of granting the approval according R107 of a vehicle Class II declaring 0 standing passengers. According to the definitions of classes II and III in paragraphs 2.1.1.2 and 2.1.1.3:

"2.1.1.2. 'Class II': vehicles constructed principally for the carriage of seated passengers, and designed to allow the carriage of standing passengers in the gangway and/or in an area which does not exceed the space provided for two double seats;

2.1.1.3. 'Class III': vehicles constructed exclusively for the carriage of seated passengers;"

Spanish position is that a vehicle with no standing passengers declared should be considered a Class III vehicle, but according to the manufacturer some delegations might have a different position, it would be appreciated the opinion about this subject of the GRSG delegations.