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Concerning Draft Regulation on Vehicle Forward Visibility

Transmitted by the representative of the Russian Federation

During the 124th session of WP.29, the delegation of Japan distributed informal document No. 10, concerning the development of a national regulation regarding the car forward visibility. The development of that document was carried out in response to unfavourable statistical data, with road accidents mostly caused by insufficient visibility of multi-purpose sports utility vehicles (SUV).

The Russian Federation traditionally pays attention to the evaluation of visibility of all categories of vehicles. For more than 30 years Russia applies a federal standard related to that issue, and since 1993 the requirements for visibility are included in the national certification system for road vehicles. The Russian standard applies to the M and N category vehicles, and with respect to the requirements set for the vehicles of M1 category, it is almost harmonized with the EC Directives 317, 318, 366, and 649.

The regulatory problem of evaluation of visibility being brought to the attention of WP.29 by the Japanese delegation should be supported. The Russian Federation supports in general the idea of developing of international regulations related to visibility, however, it would like to express some comments to the document proposed by Japan:

1. The requirements established in regards to the driver's field of vision do not concern the items, which, according to the authors, define the "invisible space" created by a side pillar and a rear-view mirror, in particular the width of a pillar. There are no requirements concerning cleaning of critical area on the windscreen, etc.
2. For eliminating the "invisible space" mounting of auxiliary mirrors allowing watching for the "invisible space" may be recommended. But, in this case, the test procedure for such mirrors should be established.
3. In the proposed document the standard position of driver's eyes is not defined.

C o n c l u s i o n

Taking into account the already existing experience in the field of standardization of requirements with regard to road vehicle visibility, the Russian Federation supports the idea of developing of international regulations related to the mentioned subject. The Russian Federation proposes to include into the WP.29 Work Programme the development of the draft regulations on visibility for all categories of vehicles.

The regulations to be developed should take into account specific design features of SUVs. The draft regulations could be developed on the basis of the EC Directives. The harmonized regulations expediently may be based on the method setting the requirements to the field of vision, as it is established in the Russian standard GOST R 51266 "Road Vehicles - Visibility from the Driver's Seat - Technical Requirements - Test Methods", which corresponds with the EC Directives in the terms of specifications and procedures for the determination of visibility of M1 category vehicles, but at the same time, the scope of which includes the requirements for vehicles of other categories.

If WP.29 might wish to consider being expedient in developing of such draft regulations, the experts from the Russian Federation are ready to participate in the work.
