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PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 43
(Safety glazing)

Transmitted by the Expert from the European Association
of Automobile Suppliers (CLEPA)

Note: The text reproduced below was prepared by the expert from CLEPA in order to propose amendments to the proposal of document TRANS/WP.29/GRSG/1999/12, to which it refers.

Note: This document is distributed to the Experts on General Safety Provisions only.

A. PROPOSAL

Paragraph 2.19., amend to read:

"2.19. "Safety glazing material requisite for driver's vision" means safety glazing material used as a windscreen or as front side-windows, through which the driver's forward field of view of 180° is obtained. It also covers the rear and rear side windows, except when the rear field of view is obtained by two exterior rear-view mirrors in accordance with Regulation No. 46."

Paragraphs 5.5.5. and 5.5.7., the footnotes 1/ and 2/, should be deleted

Annex 14, paragraphs 6.1.3.1., 6.1.3.2. and 6.1.3.3., should be deleted

Annex 16, paragraphs 6.1.3.1., 6.1.3.2. and 6.1.3.3., should be deleted

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B. JUSTIFICATION

The United Kingdom proposal on installation requirements was briefly discussed at the seventy-eighth GRSG session. CLEPA has in the meantime studied the document and finds it to be in the main part acceptable. Some areas, however, need clarification.

The definition for safety glazing requisite for driving visibility contained in paragraph 2.19. is confusing. Currently, in all countries applying Regulation No. 43, the practice is to grant approvals and to allow the use of glazing materials with less than 70 per cent light transmission behind the B pillar, provided that the rearward field of view requirements specified in Regulation No. 46 are satisfied using two exterior rear-view mirrors. The wording of the United Kingdom proposal appears to indicate that any glazing to the rear of the B pillar would have to satisfy the 70 per cent light transmission requirement specified in paragraph 9.1.4.1. of the Regulation. If this is the case, it would not only be a reversal of current practice but it would also be in contradiction with the generally accepted interaction of Regulations Nos. 43 and 46. Any such confusion could be avoided by amending document TRANS/WP.29/GRSG/1999/12 as indicated:

If CLEPA's modification of the definition were accepted, it would mean that there would be no abrasion resistance requirement for plastic glazings in positions which, according to the new definition, are not requisite for driving visibility, e.g. a rearward facing window where the rear-view requirement is satisfied using two exterior mirrors. CLEPA thinks that this would not be advisable because any light scattering particularly during night time driving would be very distracting for the driver. This eventuality is already covered in the current version of Regulation No. 43 where the abrasion resistance requirements for plastic glazing materials (annexes 14 and 16, paragraphs 6.1.3.1. and 6.1.3.2.) are:

- for plastic safety glazing used in locations requisite for driving visibility:

Outer surface	1000 cycles with 2 per cent haze
Inner surface	100 cycles with 4 per cent haze

- for plastic safety glazing used in locations not requisite for driving visibility:

Outer surface	500 cycles with 10 per cent haze
Inner surface	100 cycles with 4 per cent haze

No abrasion resistance requirement is necessary in the case of trailers and motor caravans. The reason for this derogation is that in certain types of vehicle the glazing may be located such that it is never used either for direct or occasional driver's vision. Nevertheless, the CLEPA view is that if direct or occasional vision is required the above provisions should apply for all vehicles.

CLEPA is aware that the table in annex 21 needs to be reviewed in line with the above amendments and is ready to draft a discussion paper if the underlying document is accepted.

CLEPA furthermore has the following additional comments on plastic glazings requisite for driving visibility:

- the proposed differentiation in test requirements linked to installation requirements in paragraphs 6.1.3.1. and 6.1.3.2. means 2 possible different markings on a window requisite for driver's vision, depending on the vehicle category. Apart from the question why the windows requisite for driver's vision installed in special purpose M1 vehicles should be allowed to be of lower quality regarding their abrasion resistance compared to those installed in 'normal' M1 vehicles (implied in paragraph 6.1.3.2. of annexes 14 and 16 and in line (3) of the table in annex 21), such a practice would lead to confusion, not only for the car manufacturer when installing the windows as original pieces but especially in the frequently occurring case that the special purpose M1 vehicle is re-sold to a private person.

- Line (3) of the table in annex 21 implies that lower abrasion resistance (M: 500 cycles, 10 per cent) could be allowed for windows at locations requisite for driver's vision, when located behind the driver's R point. CLEPA thinks that this is not acceptable. All glazings requisite for the driver's vision must conform to the abrasion resistance requirements, independently of the vehicle category in which they are installed. When glazings located behind the driver's R point become not requisite for driver's vision (see definition in paragraph 2.19.), then they are submitted to lower requirements (500 cycles, 10 per cent) or none (trailers and motor caravans).

Deletion of footnotes 1/ and 2/ of paragraphs 5.5.5. and 5.5.7., makes it clear that only one of either symbols should be applied.
