

**COMMENTS ON CONTEMPORARY WORDING OF REGULATION No. 17-07**  
(APPROVAL OF VEHICLES WITH REGARD TO THE PROTECTION OF THE SEATS, THEIR ANCHORAGES AND HEAD RESTRAINTS)

**Transmitted by the Expert from Czech Republic**

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**Note:** Some experiences from application of the valid series of the said ECE Regulation showed that in certain places its wording did not eliminate the ambiguity in its possible interpretation by different technical services. It is highly recommendable to prepare and publish its next series of amendments as soon as possible and in a **consolidated textation**.

The text below is presented to the GRSP Meeting for consideration.

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**Proposals:**

Paragraph 1, amend to read:

*“This Regulation applies to the strength of the seats and their anchorages in vehicles of categories M1 to M3, N1 to N3, whether or not fitted with head restraints, ....”*

Justification: Not all but only those categories of vehicles are mentioned in paragraphs of discussed Regulation.

Paragraph 2.6.1 to 2.6.3, amend to read:

- „2.6.1. longitudinal translation (or transposition);*
- 2.6.2. vertical translation (or transposition);*
- 2.6.3. angular movement (rotation or inclination or pivoting);“*

Justification: to abolish the use of one expression for two different activities and to save the term „displacement“ only for paragraph 2.7.

Annex 5, amend the drawing to bring it into compliance with the relevant description in text emphasizing the three main conditions as follows:

- a) the **radius of the sphere**  $165/2=82,5$  mm shall be diagrammed greater than the distance 65 mm,
- b) the **displaced position of head restraint** under loading force **F** shall be given by its rotation around the point **R**,
- c) the **measured deformation „x“** shall be given by the distance of two parallel lines: the displaced reference line **r<sub>1</sub>** and the tangent **Y** in contact „sphere-restraint“.

Justification: From the four drawings presenting the same problem of „Details of lines drawn and measurements taken during tests“ which were officially published in Annex 5 to **ECE 17R-04** (with mistakes a,b), in Annex 5 to **ECE 25R-03** (with mistake b), in Fig.2 of App.3 of Annex II to **96/37/EC** (with mistakes a,b, c!) and in **Annex IV to 78/932/EEC** (no mistake) the only last one mentioned here is perfectly correct, see enclosures 1,2. The use of the last Figure like the most simple and illuminating one also for all other cases mentioned could emphasize the desirable EC to ECE harmonization.

Annex 9, amend Figures 1 and 2 to make clear the block form:

The type 1 test blocks shall be diagrammed like two *cubes* 300mmx300mmx300mm.

Paragraph 5.3.1 in formulation from Reg.ECE 17R-06, amend to read:

„5.3.1. A head restraint **shall be** mounted on every outboard front seat in every vehicle of category M1. Seats with head restraints intended for fitting in other seating positions **may also be** approved to this Regulation under conditions relevant for the said category of vehicles.“

Paragraph 5.3.2 in formulation from Reg.ECE 17R-06, amend to read

„5.3.2. A head restraint **shall be** mounted on every outboard front seat in every vehicle of category M2 with a maximum mass not exceeding 3500 kg and of category N1. Head restraints mounted in such vehicles **shall comply** with the requirements of Regulation No.25 as amended by the series 03 of amendments. Seats with head restraints intended for fitting in other seating positions **may also be** approved to this Regulation under conditions relevant for the said categories of vehicles.“

Remark: in this wording of para.5.3.2 its compliance with the higher requirements of para. 5.3.1 is also acceptable but not forbidden.

Insert a new paragraph 5.3.3, to read:

„5.3.3. Seats with head restraints, intended for fitting in categories of vehicles not covered by para.5.3.1. and 5.3.2 **may also be** approved to this Regulation if head restraints mounted in such vehicles **comply** with the requirements of Regulation No.25 as amended by the series 03 of amendments.“

Justification: If head restraints were fitted they should comply with certain requirements.

**For further consideration:**

Paragraphs 13.4 to 13.6, add a new footnote:

“...as amended by the 07 series of amendments \*/

\*/ That incorporates validity of paragraphs: 3.2.1.1, 5.1.6, 5.15 to 5.15.4, 6.3.1, Annex 1(item 7 and 21), Annex 2, Annex 9.”

Justification: in the document E/ECE/TRANS/505/Rev.1/Add.16/Rev.3/Amend.3 of 4.11.1998 are incorporated two different sets of dates of entry into force for the **06** and **07 series** of amendments. But that in an unfortunate way unified document does not give any information how its other paragraphs should be sorted in respect of the said series, i.e. at first when to introduce the test of protection against displacement of luggage. Nobody can find the right answer without assistance of the separated basic ECE working documents on said draft amendments. But that seems to be not quite legislatively elegant.

During the 117th meeting of WP.29 the adoption of Corrigendum 1 to the 06 series of Amendments was recommended. Sorry it eliminates only the overlap in terms between **05** and **06 series** of amendments and not yet the above mentioned important **discrepancy of 06 and 07 series**.

Harmonisation ECE/EEC:

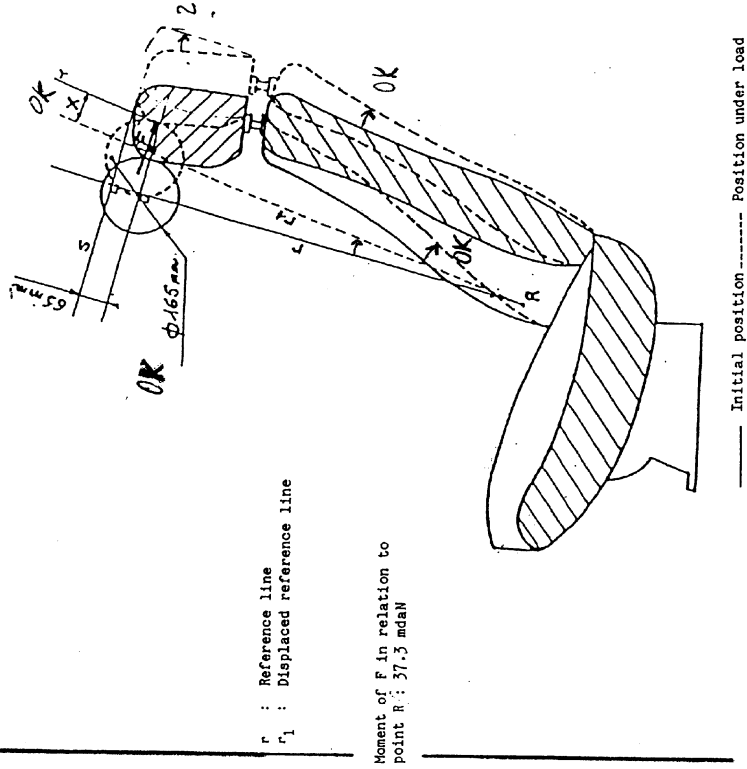
The last valid 07 series of amendments of Regulation No.17 should be adapted to technical progress in the way to allow an **ECE component type-approval of a seat**. Such a very desirable possibility is already incorporated in the Commission Directive 96/37/EC which is the last amendment of Council Directive 74/408/EEC.

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DETAILS OF LINES DRAWN AND MEASUREMENTS TAKEN DURING TESTS



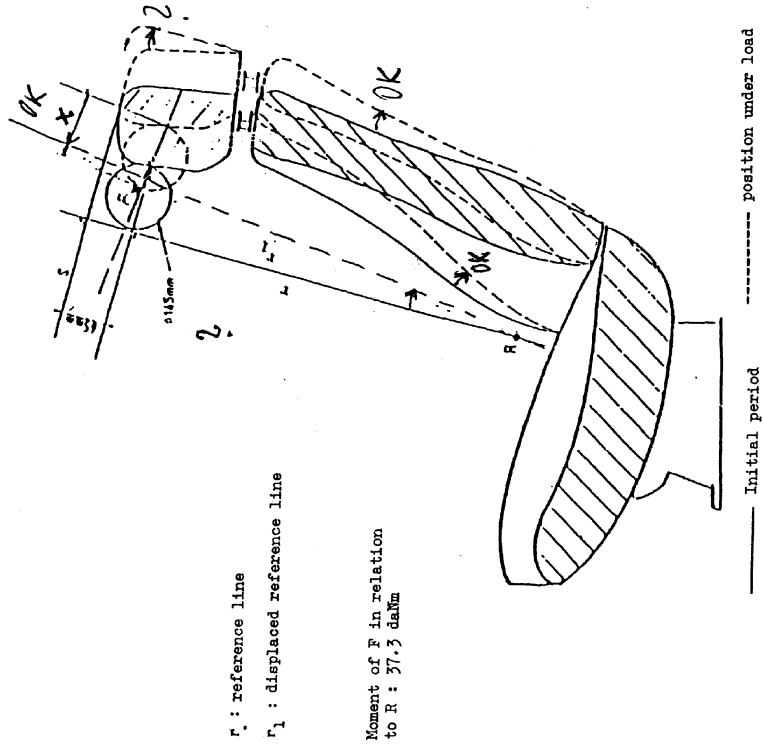
r : Reference line  
r<sub>1</sub> : Displaced reference line

Moment of F in relation to  
point R : 37.3 mdan

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DETAILS OF LINES AND MEASUREMENTS  
TAKEN DURING TESTS



r : reference line  
r<sub>1</sub> : displaced reference line

Moment of F in relation  
to R : 37.3 daNm

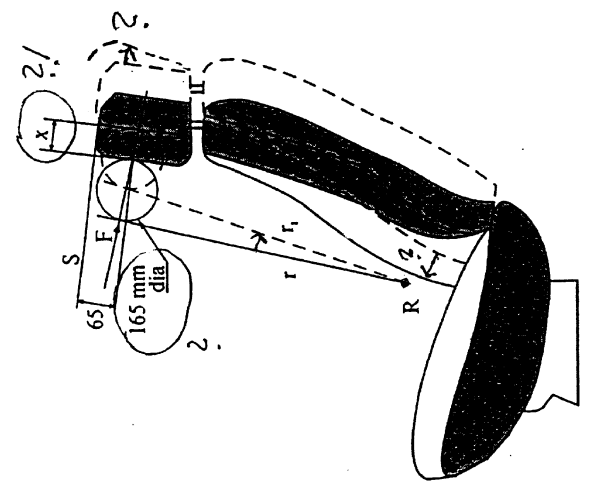
**ENCLOSURE 2**

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ANNEX IV			
DETAILS OF LINES DRAWN AND MEASUREMENTS TAKEN DURING TEST			
78/932/EEC			

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96/37/EC Annex II. App. 3

Figure 2



— Initial Position  
 ..... Position Under Load  
 r: reference line  
 r': displaced reference line  
 Moment of F in relation to R = 373 Nm

25. 7. 96

