

Concerns regarding proposal for amendments to UN Regulation No. 58

The text reproduced below was prepared by the experts from Sweden, to raise concerns regarding proposed amendments to UN Regulation No. 58 in ECE/TRANS/WP.29/GRSG/2014/18. The concerns relate to the impact of the proposal on test conditions for type-approval of rear underrun protection devices (Part 1 and Annex 5 of UN Regulation No. 58)

I. Concerns

Current text:

1. TEST CONDITIONS FOR RUPDs

- 1.1. At the request of the manufacturer the test may be conducted either:
 - 1.1.1. On a vehicle of the type for which RUPD is intended; in this case the conditions set out in paragraph 2 shall be observed; or
 - 1.1.2. On a part of the chassis of the vehicle type for which the RUPD is intended; this part shall be representative of the vehicle type(s) in question; or
 - 1.1.3. On a rigid test bench.
- 1.2. In the case of paragraphs 1.1.2 and 1.1.3 the parts used to connect the RUPD to part of the vehicle chassis or to the rigid test bench shall be equivalent to those which are used to secure the RUPD when it is installed on the vehicle.
- 1.3. At the request ...

Proposed text:

1. TEST CONDITIONS FOR RUPDs

- 1.1. At the request of the manufacturer the test may be conducted either:
 - 1.1.1. On a vehicle of the type for which RUPD is intended; in this case the conditions set out in paragraph 2 shall be observed; or
 - 1.1.2. On a part of the chassis of the vehicle type for which the RUPD is intended; this part shall be representative of the vehicle type(s) in question; or
 - 1.1.3. ~~On a rigid test bench.~~
- 1.2. In the case of paragraphs 1.1.2., ~~and 1.1.3~~ the parts used to connect the RUPD to part of the vehicle chassis ~~or to the rigid test bench~~ shall be equivalent to those which are used to secure the RUPD when it is installed on the vehicle. **The part of the chassis can be fixed on a rigid test bench as shown in Figure 1.**
- 1.3. At the request...

With the proposed text the manufacturer of devices can only perform tests under vehicle specific conditions. This means that the proposal changes the provisions for RUPDs from generic devices (components), which can be installed on a range of vehicle types, to vehicle specific devices (STU).

This may lead to that a device will have to undergo several tests to be installed on a range of vehicles according to Part II. If this is the case, it will have a large impact on RUPD-manufacturers.

Is this the intention of the proposal as it is presented?

As the experts from Sweden understand, this was also a concern raised by CLCCR in GRSG-106-11.
