

**POSITION TO THE DRAFT AMENDMENT TO REGULATION NO. 29 REV.1
TRANSMITTED BY THE UNITED KINGDOM TO THE 32TH MEETING OF GRSG FOR
CONSIDERATION**

Transmitted by the Expert from the Czech Republic

Paragraph 1 Scope:

We prefer the definition „**to commercial vehicles of categories N2 and N3**“ but we can also step back at most to „**N1 over 2500 kg, N2 and N3**“. Anyhow that wording must be combined with amendmends as follows:

Paragraph 5.2. Vehicles **with a separate driver's cab** not exceeding 7 tonnes TPMM shall be subjected, at the manufacturer's choice, either to all tests specified in Annex 3 to this Regulation or only to tests A and B. **Vehicles with a driver's cab integrated with their delivery box shall be subjected only to test A.** One, two

Paragraph 5.2.1 Vehicles **with a separate driver's cab exceeding** 7 tonnes TPMM shall be subjected, at the manufacturer's choice, **either** to test C specified in Annex 3 to this Regulation and to tests D and E specified in Annex 6 to this Regulation or only to tests D and E. **Vehicles with a driver's cab integrated with their delivery box shall be subjected only to test D.** One, two

Paragraph „Definitions“, change numbering from „1“ to „2“

Paragraph 5.2.2, insert a new paragraph behind it:

Annex 3, delete paragraphs 4.1.3.1, 3.1.3.2, 3.1.3.3 (compare to 4.2.1 to 4.2.3) and add numbering before these two text rows:

4.1.4. The distance a.....

4.1.5. The reduced mass m_a

Annex 3, amend to read:

Amend to read „**5.** Roof strength“ in place of „1.“

Amend to read „**6.** Rear-wall strength“ in place of „2“, and „**2 kN**“ in place of „2 kn“.

Annex 3, Appendix 1, paragraph 1.5, unify the expressions „load, stress“ to read „**force**“ and amend „kgf“ to read „**Newton**“ (3 times).

Annexes 6 and 7 should be deleted

Justification: We reject to open new test procedures only for a part of vehicles sizes. The proposed two new tests require from the authorized technical services to built two further huge test facilities (Swedish pendulum, drop weight facility) to the now existing ones. They are similar to the original ones but agresivities of their effects differ and are mostly uncomparable or at least (in the case of bonneted cabs) unsure. Why not improve only the parameters of the existing procedures for A, B tests (see Ann.3, § 4.2.4) instead of change in test equipment? The proposed way seems to be the most expensive one.

Annex 6, amend „swing-bob“ to read „**impactor**“ (10 times) to bring the terms used here into compliance with Annex 3.

Annex 6, paragraph 4.1.2, specify the chains without reference to the national Swedish Regulation (reference to lower legislative level is not appreciable).

Annex 6, paragraph 4.1.4, bring the value of impact energy into compliance with Annex 3, paragraph 4.2.4.