

**UK Comments on the various documents under agenda item 2.4.
(Regulation No. 46: Devices for indirect vision)**

TRANS/WP.29/GRSG/2006/12

The UK does not support this document, as it does not consider that the proposed amendments are necessary or add any clarification.

Para. 2.1.4.

The UK is opposed to this amendment.

Justification:

The use of the words "if pertinent" in the current text means that a change in the attachment to the bodywork does not always have to result in a mirror being considered a new type. If a change in the attachment means the mirror sits further away from the body of the vehicle, then it might be appropriate for the mirror to be considered as a different type, as the viewing angles will be different. It will be for the type approval authority (in consultation with the manufacturer) to determine whether a change in the attachment is pertinent.

Para. 15.2.1.1.1.

The UK does not believe that this clarification is necessary, as it is implied by the reference in the existing provisions for the compulsory Class I mirror.

TRANS/WP.29/GRSG/2006/13

The UK supports this document, but would point out that the negative (-) sign has been omitted from the table in the horizontal co-ordinates column, for those values relating to seat angles 5 - 24 degrees

TRANS/WP.29/GRSG/2006/18

The UK does not support this document.

Para. 15.2.1.1.1.

The UK believes that the existing text in Regulation No. 46 is perfectly clear. This proposed amendment does not give any greater clarity, and would mean that the Regulation is no longer fully aligned with the EC Directive.

Para. 15.2.2.2.

Is the existing text intended to apply to all mirrors fitted (both compulsory and optional), or just compulsory mirrors? This perhaps needs to be clarified before deciding whether additional text is required to exempt optional mirrors on the driver's side.

Para. 15.2.4.8.1.

The UK does not support this proposal.

Justification:

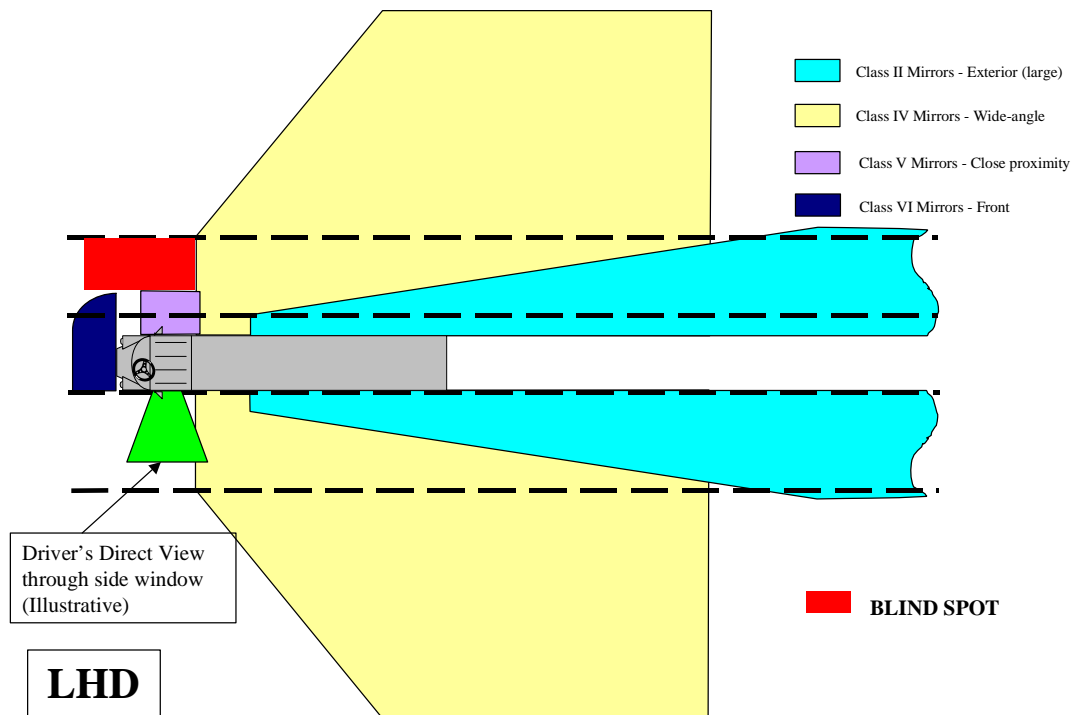
The current text permits a maximum of 15 per cent of the prescribed field of view to be obscured by various features of the vehicle, including framework or bodywork of the vehicle, etc. By excluding the framework and bodywork of the vehicle, etc. from the 15 per cent obscuration limit means that in practice a vehicle could have a much greater reduction in the field of view

GRSG-89-26

The UK believes that there are some aspects of the Japanese document that are worthy of further consideration, particularly with regards to extending the field of vision around the passenger side of the cab of heavy goods vehicles (HGVs).

The UK have observed that on HGVs with a high cab there is a blind spot alongside the cab on the passenger side of the vehicle, beyond the field of view in the Class V (close proximity) mirror. This area can be critical on a dual carriageway, when the driver of an HGV may not see a smaller vehicle alongside, and may attempt to pull over into that lane, resulting in what is commonly known as a "sideswipe" accident, when the sides the vehicles make contact with each other (see diagram below).

View of the road with Mirrors fitted according to Reg. 46.02



The UK believes that some action should be taken to address this blind spot, either by direct or indirect vision, and that the Japanese document is one possible approach.

The UK would be interested to hear the views of other delegations concerning this blind spot, and whether they support the need for some action.

GRSG-90-11

The UK needs more time to consider this proposal and wishes to enter a study reservation.