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Working Party on General Safety Provisions

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Regulation No. 107 (M₂ and M₃ vehicles)**Proposal for further amendments to Regulation No. 107****Submitted by the expert from the International Road Transport Union***

The text reproduced below was prepared by the expert from the International Road Transport Union (IRU) to allow the installation of driver seats without suspension systems and to exempt Class I urban buses from the mandatory requirement in Regulation No. 107. It is based on informal document GRSG-99-22, distributed at the ninety-ninth session of the Working Party on General Safety provisions (GRSG). The modifications to the current text of the Regulation are marked in bold for new or strikethrough for deleted characters.

*In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106 and ECE/TRANS/2010/8, programme activity 02.4), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Annex 3, paragraphs 7.7.14.7. and 7.7.14.7.1., amend to read:

- "7.7.14.7. The seat shall be adjustable in its longitudinal and vertical positions and in its seat back inclination. It shall lock automatically in the selected position and, if fitted with a swivelling mechanism, it shall lock automatically when in the driving position. ~~The seat shall be equipped with a suspension system.~~
- 7.7.14.7.1. ~~The suspension system and the vertical position adjustment~~ **are is** not mandatory for vehicles of Class A or B."

II. Justification

1. UN Regulations should only deal with essential matters of safety for the driver, passengers and other road users. They should not deal with comfort or typical usage. Therefore, a suspension seat for the driver should not be mandatory; the decision should be voluntary for the operator and their drivers to choose which type of driver seat is the correct one for the safe operation of their services. Urban bus operations are typically short regular journeys with frequent stops. Efficient use of driver availability necessitates frequent driver changes from one bus to another throughout the shift. This frequent change increases the likelihood that drivers will not adjust suspension seats to give the correct mid-range travel according to the weight of the driver.

2. A survey of drivers suggests that, when passing traffic calming measures, they have less control over the speed and braking of a bus with a "suspension" seat than with a static seat without an air or hydraulic suspension system. In this respect, passengers are at greater risk of injury due to a less smooth ride. A static seat ensures that the driver feels the same movements as the passengers and, as a result, he/she drives better according to the road conditions. Following driver experiences on safety grounds, the driver's suspension seats in buses have been replaced in some cities by static seats.

3. Drivers do not risk exceeding the maximum exposure for whole body vibration during a typical shift. Therefore, a static seat is adequate.

4. The maximum safe working load of some suspension seats is insufficient to cope with the weight of some drivers. This would make the seat "bottom out" when traversing a speed bump resulting in a sudden strong jolt to the driver. Some drivers "lock out" the suspension system to prevent this phenomenon which could lead to unsafe situations.