



TASK FORCE DIRECT VISION: PROGRESS & STATUS OF THE DRAFT REGULATION & KEY DISCUSSION POINTS

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OBJECTIVES

- High Level overview of the latest status
 - Implementing agreed (VRU Proxi 19) 'Hybrid' approach and limit values in regulatory text
 - Physical test method
 - Developing a simplified approach for M2/N2 [and M3] vehicles
 - The potential for small exemptions for existing vehicle types compensated by active safety
 - The potential to reduce unnecessary design constraints associated with the frontal limit value

CORE REGULATORY TEXT

- Initial draft incorporating latest agreements complete (except information doc)
- Text added to define separated views to each side, separated by A-pillars, to enable agreed hybrid approach
- Limit values applied as shown

	Minimum Volume (m ³) by Direct Vision Level		
	1	2	3
Visible Volume (Nearside)	3.4	Not Specified	Not Specified
Visible Volume (Front)	1.8	1.0	1.0
Visible Volume (Offside)	2.8	Not Specified	Not Specified
Visible Volume (Total)	11.2	8.0	7.0

PHYSICAL TEST METHOD

- Practical testing has been completed by LDS with no major difficulties, some small refinements
- Results from simulating the physical method show there is no single height for measurement that accurately represents volume across all truck designs studied.
 - Evaluating at 5th female shoulder height under-estimates volume for tall vehicles.
 - Evaluating at top of assessment zone (95th male shoulder height) under-estimates volume for low vehicles
- Options for solution
 - Evaluate at 3 heights (improved accuracy, additional test effort)
 - Evaluate at top of zone (vehicles that are under-estimated pass by a large margin so does not affect approval. Risk: unintended consequence, new designs?)
- Initial decision - implement in regulatory text at 3 heights and simplify later if further analysis concludes it is reasonable.



M2, N2 AND [M3] VEHICLES

- Draft Regulatory text developed, subject to validation by OICA
- Principle
 - M2/N2 derived from N1 can be approved according to revised R125 as alternative
 - Other M2/N2 [and M3] in practice will usually greatly exceed level 1 requirements and can be deemed to comply if certain geometrical criteria showing they are suitably low to the ground are met

SMALL EXEMPTIONS FOR EXISTING TYPES & COMPENSATION BY ACTIVE SAFETY

- Agreed to add a proposal for an amendment with Transitional Provisions to enable this
- Aim: to develop proposal in parallel with finalisation of core proposal so CPs are informed of all intentions when deciding on core proposal
- Initial discussions around:
 - The use of height measures to identify the relevant vehicles and any risks of incentivising height increases
 - Mechanisms to ensure only partial exemptions – i.e. vehicles still apply all vision improvements (e.g. CMS, lower door windows) even if they still can't meet main limit value
 - The format of the active safety compensation required (e.g. “Motion Inhibit” system for moving off situation)

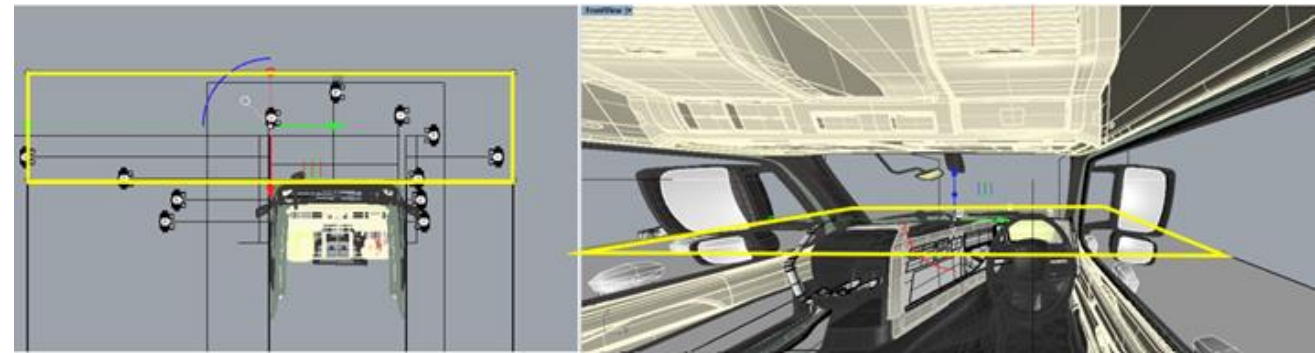
MINIMISING DESIGN CONSTRAINTS ASSOCIATED WITH APPLICATION OF A 'SEPARATED APPROACH' WITH LIMITS TO EACH SIDE

- Agreed that this is necessary but not straight forward
- Very likely it will need to be implemented as a subsequent amendment to 1st core regulatory proposal
- Will be developed in parallel and as quickly as possible
- Agreed that a method similar to T&E proposal (Option 2) appears most likely to succeed
 - Front Zone – full width ahead of frontal plane
 - Nearside – residual area to nearside of nearside plane
 - Offside – residual area of offside of offside plane
- Agreement that ACEA & LDS will work together to solve
- Funding support for LDS contribution is sought

Current front volume is between the A-pillars



Proposed to change to all of assessment volume ahead of frontal plane





SUMMARY

- Progressing well on proposal for a 1st core regulatory text, based on agreements at VRU-Proxi 19
- Significant issues still open and likely to become parallel or subsequent amendments
 - Exemptions existing types compensated by active safety
 - Reducing the design dependency of limits to each side