Japan's Opinion for the R129 Phase 2 and Correction of an Editorial Error in the Draft of Phase 2

41st GRSP Informal Group on Child Restraint System

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JASIC

Japan's Opinion on the Side Impact Test

- **Booster seat with high backs should be conducted the side impact test.**

- **Booster cushion without high backs should not be conducted the side impact test.**

➢ **Necessary to indicate (for example, by the caution label) that the booster cushions without high backs are not compliant with the side impact requirement.**

(Reference) CRS Size Ranges and Dummies Used in Dynamic Tests

- **Table 6 in paragraph 7.1.3.6. of R129 specifies the dummy used in each dynamic test per CRS size range.**

7.1.3.6Size indication

Table 6 Selection criteria for the dummy according to the range

size range indication	≤ 60	60 < x ≤ 75	75 < x ≤ 87	87 < x ≤ 105	105 < x ≤ 125	>125
Dummy	Q0	Q1	Q1.5	Q3	Q6	Q10

(Reference) CRS Size Ranges for Booster seat and Dummies Used in the Dynamic Tests

CRS size range		105	110	115	120	125	130	135	140	145	150
Frontal Impact	High back	Q3	Q6	Q6	Q6	Q6	Q10	Q10	Q10	Q10	Q10
	Cushion (over140)								Q10	Q10	Q10
Side Impact	High back	Q3	Q6	Q6	Q6	Q6	Q10	Q10	Q10	Q10	Q10
	Cushion (over140)								-	-	-

*All booster seats in size range 135 cm or bellow are high back boosters.

- ✓ For boosters with high back in size ranges 130 cm and 135 cm, the degree of difficulty of testing using Q10 dummy is almost the same for both frontal and side impact tests.
- ✓ If Q10 is not used in side impact test for CRS in these ranges, it will be necessary to amend R129

Japan's Opinion on the CRF of the Booster Seat

- The size of the non-ISOFIX universal booster seat is defined as same as the R44 requirements (UN/R44 6.1.8, 6.1.9 and 6.2.7).

- The new CRF is used only for the ISOFIX booster seat.

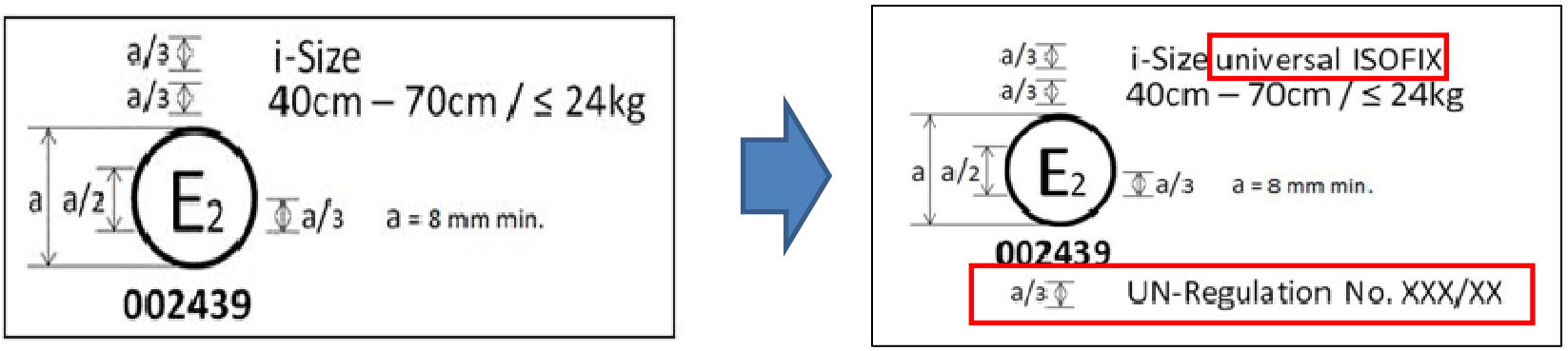
(Reasons)

- We are concerned that if only the booster seats in conformity with the CRF size that is currently being discussed were considered “universal”, those high back booster seats in size ranges 140 cm or above would have to be manufactured only as “specific” CRS.

- In this case, all the high back booster seats in size ranges above 140 cm would be considered “specific, and therefore it would become difficult for CRS manufactures to product and sell them all over the world. Consequently, these high back booster seats would not be widely used and the child occupant safety would not be improved.

Correction of an Editorial Error

- The content of ECE/TRANS/WP.29/GRSP/2013/12 (amendment of the approval marking in Annex 2 of R129) is not reflected in the draft documents of Phase 2 (CRS-40-06e)



Draft Proposal on phase II GRSP/2013/12