

Proposal to amend UN Regulation No. [16X] on Direct Vision

I. Proposal

Paragraph 6.2.2., amend to read:

"6.2.2. The subject vehicle shall be assessed with the accelerator heel point positioned at a height from the ground that ~~represents~~ **is no lower than** the mid-point between the height that the manufacturer calculates it would be at for an unladen chassis cab (without body) and that which the manufacturer calculates it would be at when the vehicle is loaded to its technically permissible design maximum.

II. Justification

Paragraph 6.2.2.

Large vehicles have high complexities relating to wheel-base, axle types, upper bodies, powertrains, etc.. and all variants have different ride-height reactions to load distributions. Establishing the exact mid-point may therefore be very complex, additionally such "mid-point" may not exist as physical variant. To avoid or mitigate this complexity it should therefore be allowed to base the certificate on a higher riding variant, assuming this represents a worse case than the mid-point.