

Italian Comments

1-Scope

- It would be better to mention explicitly tractors and agricultural towed vehicles, adding a new point 1.2.3. In particular many agricultural towed vehicles could not be understood as trailers.
- Please consider the on-going CEMA proposal to amend R.E. 3 and include R&S categories. It might be helpful also for R 55.

2-Definitions

- Paragraph to be better arranged, having a point 2.6 for automotive couplings and a new point 2.7 for agricultural couplings. Moreover a note might clarify that the first ones use capital letters and the second ones small letters.
- Even if there is no real definition agricultural couplings, a note might specify which classes are intended mainly for agricultural purposes. Please consider that “agricultural couplings” and “agricultural vehicles” are mentioned later on during the document.
- General comment: too many agricultural classes. A reduction would help and Italy is open to discuss.
- Regarding agricultural couplings and classes, a table is needed to clarify compatibility. This table should be present somewhere in the annexes and clearly referenced in paragraph 2.

4-General requirements

- Where does point 4.9 come from? TFAC agreed on a maximum effort of 40 daN and here we have a mass of 35 kg! Please provide justification and in any case come back to 40 daN.

6-Requirement for vehicles

- Current arrangement of paragraph 6 is completely wrong and leads to confusion and misunderstandings. Provisions of point 6.1 are general and applicable for all vehicles, including tractors, while point 6.2 is just dealing with the installation height on tractors only. To be modified.
- It should be clear that provisions of point 6.1 are relevant also for tractors and all agricultural towed vehicles, which may not be considered as category O trailers. CEMA proposal for amendment to R.E.3 might help.
- A note should be added in order to indicate where the aforementioned vehicles categories are defined (R.E.3).
- Reference to Annexes to be checked/corrected.
- Editorial: page 23 shall be deleted.

13-Transitional provisions

To be reviewed according to the final decisions.

Annex 1B

- From a legal and formal point of view it is not possible to have 2 different communication annexes (1A & 1B). This one is specific for “agricultural couplings”, which are nowhere defined.
- Keep one common communication format. Specificities of agricultural couplings should be dealt using the wording “if applicable” or “only for classes”.

Annex 4

- We do confirm our old comments and proposals on markings, including compatibility information. It is an important issue.
- From a legal and formal point of view it is not possible to have 2 different tables for markings. The second one is specific for “agricultural couplings”, which are nowhere defined. All classes should be collected in one table.

Annex 5

- Title is wrong. Agricultural vehicles are nowhere defined. Moreover couplings of Annex 5 may be fitted also on agricultural vehicles (why not?).

Annex 6

- Title. Same as above.

Annex 7

- Installation requirements for tractors could be moved to this annex.

Annex 8

- Title. Agricultural vehicles are nowhere defined.
- Dimensional requirements for (CUNA) classes q & r are missing. To be included. Please note that they have already been presented and discussed last February.
- Figures to be updated. Check ISO standards and new EU Regulation RVFSR.
- Table 6 (compatibility) to be reviewed. See Italian proposal included in Regulation RVFSR.

Annex 9

- To be completely modified and rearranged. Distinction among the various classes is a non-sense. Test procedure should be the same for all classes; then specific additional tests for specific classes may be added (e.g. the lateral loading on slider frames).
- Italy still in favour of alternative static test up to 40 km/h.

IT PROPOSAL

- a) Up to 40 km/h. Dynamic OR static test at the choice of the Manufacturer for ALL (agricultural) coupling devices. Test procedures taken from current EU directive and future EU Regulation RVFSR. No safety concerns and thus no reason to change.

b) Above 40 km/h. Dynamic test mandatory. Test parameters according to the Small Group proposal (see draft detailed example). Test is generally more severe than the current one and thus may be an option also below 40 km/h.