



DOUBLE MARKING ON MODULAR SYSTEMS

Frank Brouwers

Current situation: Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Based on document: CRS-55-02e Reg129 c4s00 en with phase I & II rev 2

2.57 "Module"

is a part of an ECRS that is separate from the ISOFIX connectors and is in direct contact with the child. A module can be used as stand-alone to restrain a child in a car. A base is allowed to accept more than one module (Module A, Module B, etc.).



Module A



Base



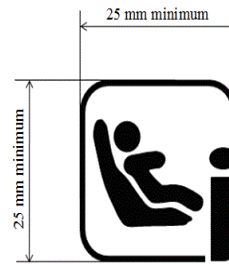
Module B

Current situation: Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

4.6 Marking for integral ECRS including ISOFIX connections

The marking shall be located on the part of the ECRS which includes the ISOFIX connectors. One of the following information labels shall be permanently visible to someone installing the Enhanced Child Restraint System in a vehicle:

4.6.1. i-Size ECRS: *The i-Size logo.*



4.6.2. Specific Vehicle ISOFIX ECRS: *The ISO ISOFIX logo*



Approval mark?

Current situation: Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

5 Approval:

5.2. An approval number shall.....etc.

A type of Enhanced Child Restraint System approved according to this regulation shall not bear another approval mark according to Regulation No. 44 (Child restraint systems).

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal new definition:

2.57 "Module"

is a part of an ECRS that is separate from the ISOFIX connectors and is in direct contact with the child. A module can **whether or not** be used as stand-alone to restrain a child in a car. A base is allowed to accept more than one module (Module A, Module B, etc.).



Module A



Module B



Base

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal markings:

Paragraph 4.1. and 4.2., amend to read;

4.1. The samples of Enhanced Child Restraint Systems, *including all modules*, submitted for approval in conformity with the provisions of paragraphs 3.2.4. and 3.2.5. above shall be clearly and indelibly marked with the manufacturer's name, initials or trade mark.

4.2. The Enhanced Child Restraint System, *including all modules*, except the strap(s) or harness, shall be marked clearly and indelibly with the year of production.

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal markings:

Paragraph 4.3., amend to read;

4.3. The orientation of the Enhanced Child Restraint System relative to the vehicle. The size range(s) of the Enhanced Child Restraint System in centimeters and the maximum occupant mass allowed for the Integral Enhanced Child Restraint System in kilograms shall be clearly indicated on the product *part hosting the child*.

If the Enhanced Child Restraint System is to be used in combination with an adult safety belt, the correct webbing path shall be clearly indicated by means of a drawing permanently attached to the Enhanced Child Restraint System *product part hosting the child*. If the restraint is held in place by..... (rest unchanged)

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal markings:

Paragraph 4.5., amend to read;

4.5. In the case of integral Enhanced Child Restraint Systems that can be used forward facing, it shall have the following label permanently attached *on the part hosting the child* and visible to the person installing an enhanced child restraint system in the vehicle:

The manufacturer shall be permitted to.....(rest unchanged)

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal markings:

Paragraph 4.6., amend to read;

4.6. Marking for integral ECRS including ISOFIX connections

The marking shall be located on the part of the ECRS which includes the ISOFIX connectors.

One of the following information labels in a vehicle:

Paragraph 4.6.1., amend to read;

i-Size ECRS : i-Size logo. The symbol shown below

.... of contrasting colors or by adequate relief if it is molded or embossed;

In case the ECRS containing module(s) this marking shall be permanently attached to the parts of the ECRS which includes the ISOFIX connectors and the module(s).

Proposal for the 01 series of amendments to phase 1 of R129 (E CRS)

Proposal approval and module marking:

New Paragraph 4.6.3. and 4.6.4., amend to read;

*4.6.3. An international approval mark as defined in paragraph 5.4.1.
In case the E CRS containing module(s) this marking shall be permanently attached to the part of the E CRS which includes the ISO FIX connectors.*

*4.6.4. An international module mark as defined in paragraph 5.4.3.
In case the E CRS containing module(s) this marking shall be permanently attached to the module part of the E CRS.*

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal approval and module mark:

5.4. In addition to the marks prescribed in paragraph 4. above, the following particulars shall be affixed in a suitable space to every Enhanced Child Restraint System conforming to a type approved under this regulation:

Paragraph 5.4.2.2., amend to read;

The size range for which the Enhanced Child Restraint System has been designed. **In case the ECRS is equipped with a module, the size range is not on the approval mark but on the module mark.**

ECRS which can be converted into another configuration for taller children shall accommodate an uninterrupted range of child statures.

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal approval and module mark:

5.4. In addition to the marks prescribed in paragraph 4. above, the following particulars shall be affixed in a suitable space to every Enhanced Child Restraint System conforming to a type approved under this regulation:

New Paragraph 5.4.3., amend to read;

5.4.3. An international module mark consisting of:

5.4.3.1. A circle surrounding the letter "E" followed by the distinguishing number of the country which has granted approval²;

5.4.3.2. An approval number, the words "Regulation No." followed by the number of this Regulation, a slash and the series of amendment ("Regulation No. 129/00");

4.6.3.3. The words Module "name of the Module", depending on the name of the module of Enhanced Child Restraint System;

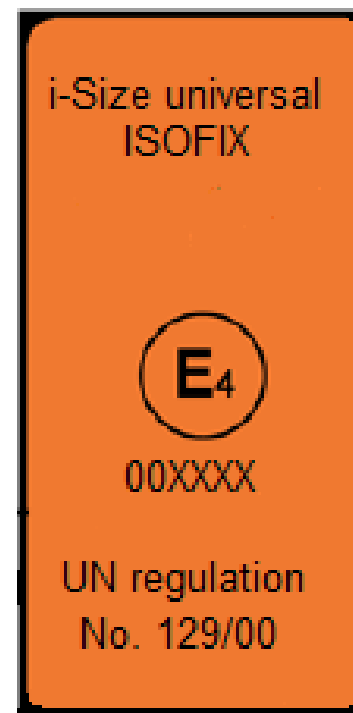
4.6.3.4. The size range including maximum weight for which the Module of the Enhanced Child Restraint System has been designed;

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

Proposal approval mark ECRS and ECRS Module and base:



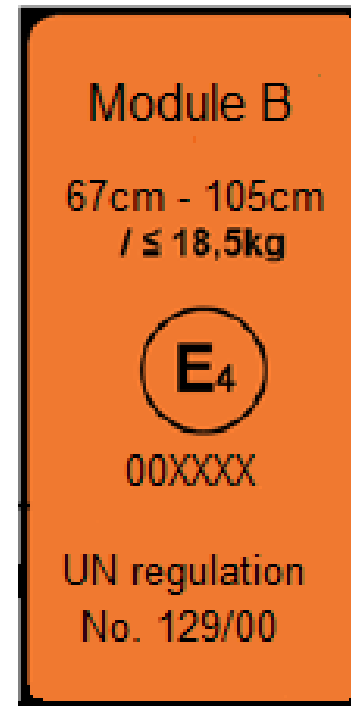
Approval mark ECRS



Approval mark ECRS
 Module and base

Proposal for the 01 series of amendments to phase 1 of R129 (ECRS)

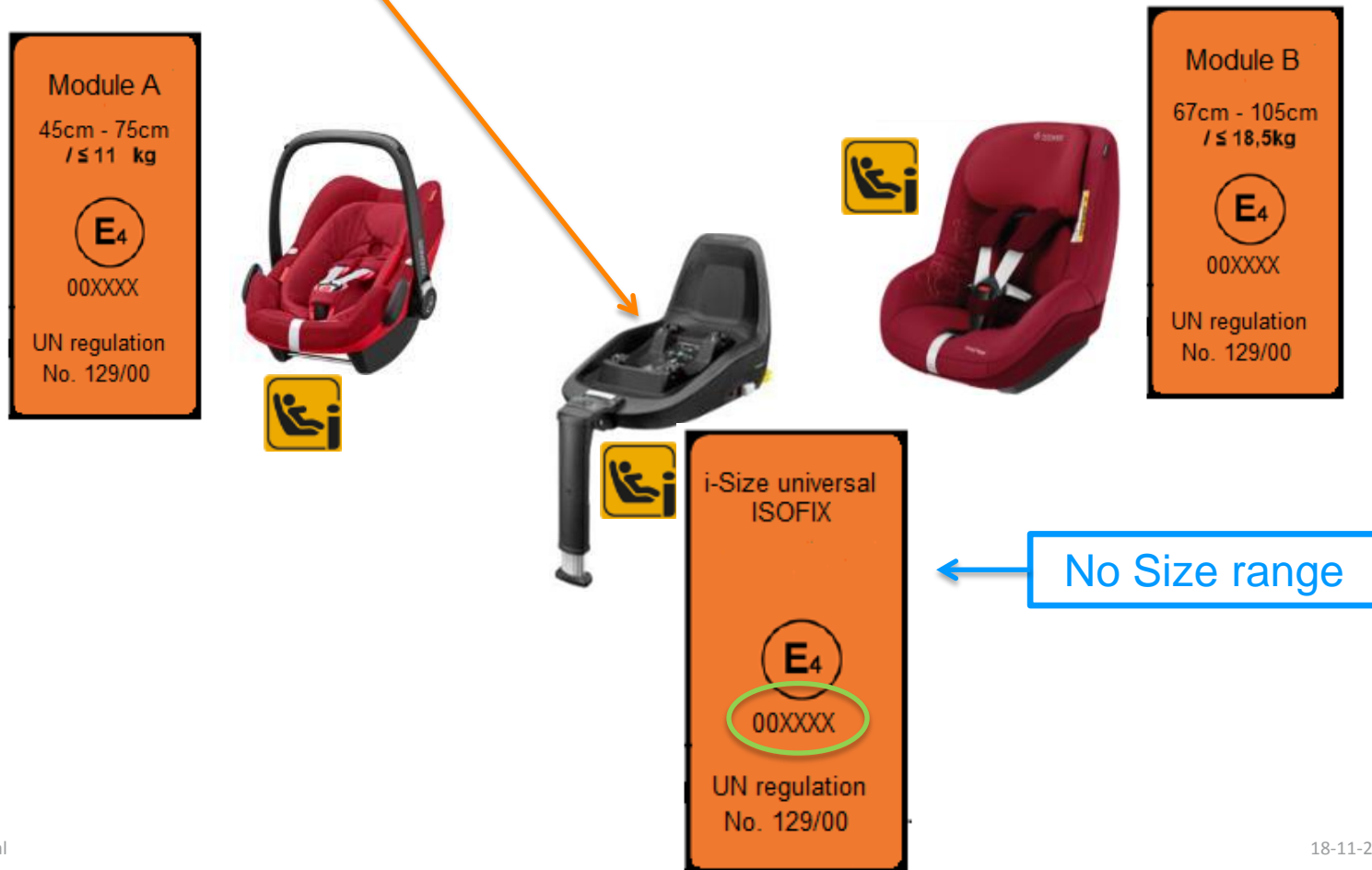
EXAMPLE: Module mark:



EXAMPLE: Double marking on modular systems

1. Approval mark (one approval: one base - two modules).

Approval mark shall be located on the part of the ECRS which includes the ISOFIX connectors.



EXAMPLE: Double marking on modular systems

2. Module mark (one approval: one base - two modules).

Module mark A, B, shall be located on the integral part hosting the child of the ECRS.



EXAMPLE: Double marking on modular systems

2. Module mark (one approval: one base - three modules).

Module mark A, B, C shall be located on the integral part hosting the child of the ECRS.





FOR MORE INFORMATION:

Frank Brouwers

T: +31 6 22408172

E: frank.brouwers@tassinternational.com

For more information, please visit: www.tassinternational.com