



RDW

Preventing misuse with ECRS that can be used with and without shield

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Concerns expressed in mail 14 October 2015 I

- In 54th report, item 5, about type approval of integral shield systems is stated: “...shield system are authorized in the current R129 regulation if they are Integral...”.
- The definition of Integral in R129 is:
“2.4.1. Integral” is a class of Enhanced Child Restraint System, meaning that the child is restrained only by components which comprise the Enhanced Child Restraint System (e.g. strap harness, shield, etc.), and not by means connected directly to the vehicle (e.g; adult seat belt).”
- The question/concern is: How should the wording “comprise” be understood?



Concerns expressed in mail 14 October 2015 II

Option 1:

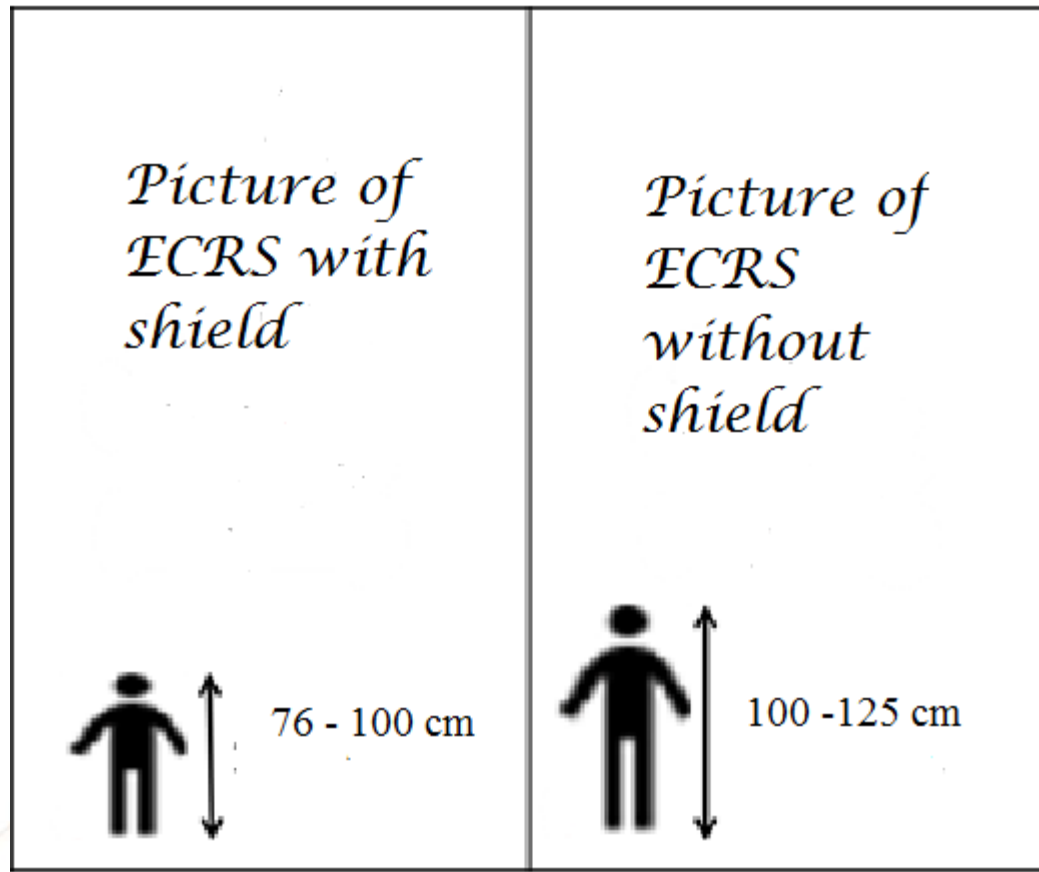
- One could understand “... components that comprise the ECRS ...” as components should be inseparable. This could be derived from also par. 6.2.3. stating:
“It shall not be possible to remove or detach without the use of specific tools, any components not to be designed to removable ...”,
- For harness belts this is safe guarded in this same par. 6.2.3. by:
“Any harness belt shall be capable of its full range of adjustment without disassembly.”

Option 2 (more pragmatic):

- Get the following message across:
if the integral shield system has also the possibility of being used without shield (non-integral), the usage of the shield is obvious explained to people that will buckle up children!
- It is considered not to be enough having this in a user manual,
- This message, in pictures, must also be given on the part that will always host the child!



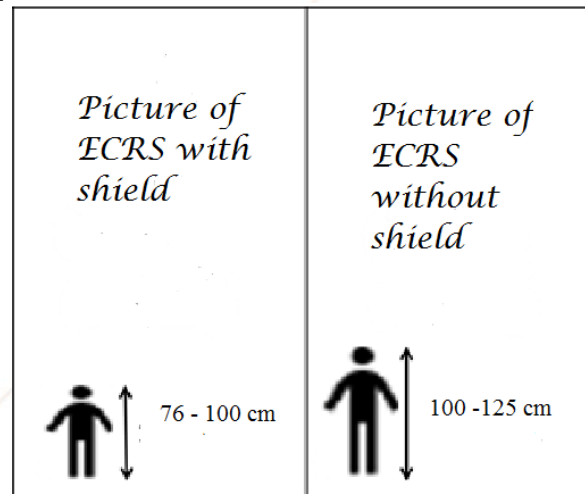
Possibility for labeling



Needed changes in regulation to prevent misuse

- Insert a new par. 4.7. that will read:
4.7. Marking for Integral ECRS with shield system that can also be used without shield as non-integral ECRS

These ECRS shall have a permanently attached label. This label shall be located on the outer surface, visible for somebody buckling up a child in this ECRS from the right or left hand side.



- Renumber par. 4.7. (non-integral ECRS) and par.4.8. accordingly

Thank you for your attention

