



Comments on BAST's Prerequisites for Deployable Pedestrian Protection Systems

Requirement	Proposed for deployable bonnets	Applies to non-deployable bonnets acc. to gtr9/UN R127?	Scope of current gtr9/UN R127 and/or practice in certification?	Comment
Pedestrian detection	Proof of "hardest to detect"	Not needed	No	<p>A) Proof of detection is clearly needed, existing legislation test with legform serves for functional proof;</p> <p>B) No proof that there are real world issues with detection of different pedestrians;</p> <p>C) Proposal mixes consumer testing with legislation;</p> <p>D) No tools certified for this purpose and biomechanical properties not validated;</p> <p>E) Implementing "Hardest to detect" penalizes deployable bonnets compared to non-deployable</p>
Protection at speeds below the deployment threshold	Proof just below the lower deployment threshold	Not needed	No	<p>A) Proof seems acceptable in the non-deployed state that basic protection is provided;</p> <p>B) Proposal mixes consumer testing with legislation;</p> <p>C) Concerns that the test tools (headforms) are not validated for the velocities to be tested</p>
Protection at higher speeds	Proof of triggering at higher velocities	No	No	<p>A) No proof of performance or protection with this;</p> <p>B) Proposal mixes consumer testing with legislation;</p> <p>C) Creates conflicts with other legal requirements (crash etc.);</p> <p>D) Implementing "Triggering at higher velocities" penalizes deployable bonnets compared to non-deployable</p>

Correct timing of the deployment	Proof that the bonnet is in place when the pedestrian hits it, depending on stature	Not needed	Yes	
Clearance requirement	Proof that a certain under-bonnet clearance is provided	No	No	<p>A) No proof of performance or protection with this (see NHTSA comment in the 1st meeting);</p> <p>B) No proof that there are real world issues with this;</p> <p>C) Proposal mixes consumer testing with legislation;</p> <p>D) Proposal is design restrictive;</p> <p>E) Implementing "Under-bonnet clearance" penalizes deployable bonnets compared to non-deployable</p>

General comment: Certification acc. to legislation covers all possible variants, standing heights etc. of a vehicle. Additional requirements therefore multiply several times. Legislation needs to consider this.