



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

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.