

**Initial comments of OICA representatives
to the 5th IG GTR9-PH2 meeting
in response to document GTR9-5-20**

OICA representatives to the 5th IG GTR9-PH2 meeting recognized document GTR9-5-20 handed in by BAST that proposes new certification criteria for the upcoming amendment to gtr No 9.

First, industry experts note that the document was made available just the day before the meeting. This does not allow a proper preparation of any discussion on this. However, some initial comments can be made:

- The current injury criteria were accepted by Industry members during the activities of the former Technical Evaluation Group. However, already during the work of this group it was highlighted several times that the process is not fully clear in all details and that the scientific basis may be challenged.
- Since the TEG finalized their work, all activities of Industry especially with regard to the feasibility of vehicle countermeasures were based on the agreement reached in TEG. New discussion on the criteria therefore need to be assessed from the beginning and will need much more time.
- It is questionable, whether the test results from BAST (that were stated to be based on tests with just two vehicles and where the number of overall tests is probably quite low) can be generalized.
- Also, it seems unclear why BAST proposes the extremes to be used seeing the relatively low number of tests.
- Finally, injury criteria should be derived from the biomechanical data or, seeing that these are available only to a certain extent, at least from reliable simulation. Deriving them from the impactor performance seems also questionable.

Seeing the arguments above, OICA attendees to the 5th IG GTR9-PH2 meeting request:

- To either stick to the injury criteria as agreed in the TEG
- Or to significantly extend of the mandate of the IG GTR9-PH2 (for at least 24 month from now on) to allow the re-assessment of the details above.