

中国 WTO/TBT 国家通报咨询中心

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Subject: Comments from P. R. China on United States of America Notification G/TBT/N/USA/1533 Federal Motor Vehicle Safety Standards; Occupant Crash Protection	

Comments from P. R. China on United States of America

Notification G/TBT/N/USA/1533

Federal Motor Vehicle Safety Standards; Occupant Crash Protection

Dear Sir or Madam,

We appreciate the opportunity to submit comments on the notified regulation proposed by United States of America.

Enclosed please find comments in English and Chinese.

Please acknowledge receipt of the comments by e-mail to Pengdy@tbtsps.com.

Thank you very much in advance for United States of America taking into account comments from P. R. China. Your formal reply will be appreciated.

Best regards,

Shi baoxiang

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Comments from P. R. China on United States of America

Notification G/TBT/N/USA/1533

Federal Motor Vehicle Safety Standards; Occupant Crash Protection

The government of the People's Republic of China appreciates the United States for fulfilling the transparency obligation under WTO, as well as for the opportunities for other WTO Members to make comments on the notification G/TBT/N/USA/1533. According to Article 2.9.4 of the WTO/TBT Agreement "without discrimination, allow reasonable time for other Members to make comments in writing, discuss these comments upon request, and take these written comments and the results of these discussions into account", China would like to put forward the following comments on the notified regulations and hope to take these comments into consideration, the details comments as follows:

1. According to the reminder mode and triggering conditions, it is recommended a two-level reminder, as follows:

The first level of warning shall be at least visual warning. When the ignition switch or main control switch is activated and the safety belt is not fastened, the indicator light shall be used for visual warning.

The second level of warning shall be a combination of visual and audible warning. When the ignition switch or main control switch is activated and the vehicle speed is $\geq 15\text{km/h}$, the indicator light will give visual warning when the safety belt is not fastened, and the audible warning (buzzer or other devices) will be activated at the same time.

2. For the occupant detection technology, it is recommended that the rear seats be equipped with SBR sensors.

3. For the Minimum duration of audible or visual warning, the recommendations are as follows:

(1) for all seating positions of the rear seat row(s) of M1 category vehicles, the first level (mentioned above) warning shall be lasted at least 60s

(2) the audible and visual signals of the second level warning shall be lasted at least 30s (excluding the interval time of up to 3s)

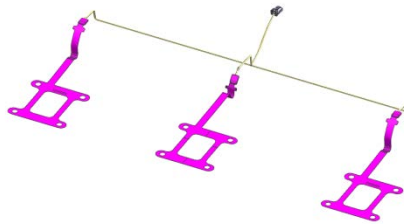
4. For the visual warning position, it is recommended that:

The visual warning location should be visible when the driver is operating normally with their seat facing forward and be recognized during the day and night and should be distinguished from other alarms.

5. According to the telltale Characteristics, it is recommended to use the following figure (the main indicator icon is red), and it is suggested that the warning indicator can distinguish the specific unbelted seat.



6. For the layout plan, such as the rear integrated three person seat cushion , it is recommended to arrange three SBR (seat belt reminder) sensors on the cushion and stick them on the cushion foam, as shown in the figure below.



7. Optimization suggestions

For the rear seat row(s) transportation of goods or pets, the occupied position may have false alarm., it is recommend to add a camera in the car for face recognition, combined with the SBR sensor, to determine whether to issue the seat belt reminder.

8. Scope of application

In order to harmonizing technical regulations, it is recommended to be consistent with ECE R16.

Comments in Chinese are in below:

中国政府赞赏美国履行 WTO 透明度义务，给予其他 WTO 成员国评议 G/TBT/N/USA/1533 号通报的机会，根据 WTO/TBT 协定 2.9.4 条“无歧视地给予其他成员合理的时间以提出书面意见，并对这些书面意见和讨论的结果予以考虑”的规定，请美国对中方的评议意见予以考虑并做出答复，中方具体意见如下：

1. 针对提醒方式以及触发条件，我们建议分为第一级提醒和第二级提醒，具体如下：

第一级提醒至少应为视觉提醒，当点火开关或主控制开关被激活，触发安全带未系提醒时，使用指示灯视觉提醒。

第二级提醒应为视觉和听觉提醒结合，当点火开关或主控制开关被激活，车速 $\geq 15\text{km/h}$ 后，触发安全带未系提醒时，指示灯视觉提醒，同时启动听觉提醒（蜂鸣器或其它装置）。

2. 针对乘员检测技术，我们建议后排座椅配备 **SBR** 传感器。

3. 针对声音或视觉提醒的最短持续时间，我们建议：

(1) 对于 M1 类车辆，后排座椅的第一级视觉提醒至少持续 60s；

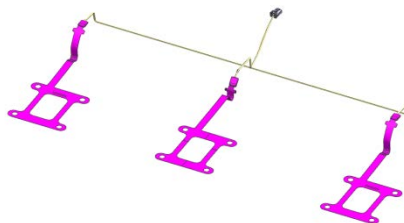
(2) 第二级提醒的听觉和视觉信号至少 30s（不包括多达 3s 的间隔时间）。

4. 针对安全带未系提醒的视觉警告位置，我们建议应位于驾驶员在其座位面向前方正常操作时可见，并在白天和夜晚都能识别，且应与其他警报有所区分。

5. 针对信号装置特征，建议采用下图样式（主指示图标为红色），并建议提醒指示灯可以区分未系安全带的具体座位。



6. 针对布置方案，如后排整体式三人座垫，建议在座垫上布置三个 **SBR**（**seat belt reminder**）传感器，贴在座垫发泡上，如下图所示。



7. 优化建议

针对后排运输货物或者宠物，占用位置可能会出现误报，可以考虑增加车内摄像头进行人脸识别，结合 **SBR** 传感器，判断是否发出安全带未系提醒。

8.适用范围

为了技术法规的协调性，建议与 ECE R16 保持一致。