

OUR COMMENTS

Fitting Blind-Spot Mirrors on Existing Trucks

- (1) *Do the benefits of retrofitting existing trucks built in or after 1998 outweigh the costs?*

Yes, from the paper and the information given it seems that the retrofitting of existing trucks built in or after 1998 outweighs the costs.

- (2) *Is the approach, including the discussion of alternative solutions, the correct one?*

Both, the approach and the discussion of alternative solutions regarding the retrofitting of existing trucks built in or after 1998 are correct.

- (3) *The Commission would be particularly interested in the manufacturers' view on the limitation of the scope of a retrofitting obligation to vehicles having European type approval. Furthermore, it is interested in the percentage of HGV'S which would be excluded from a retrofitting directive on the basis of this exclusion criterion.*

This particular interest of the Commission as stated above is very helpful if the necessary information is provided by the manufacturers. Further to the above the Commission should be provided with the necessary information by the manufacturers about the trucks which have not a European Type approval but if they can be fitted with such type of mirrors, with what necessary modifications if needed and what is the cost.

- (4) *Do you have any other comments or questions?*

The whole approach by the Commission is correct. Some other comments are the following.

- Priority should be given to the trucks which are doing international journeys, since some of them might have different steering positions from the country in which they pass or circulate.
- Priority should be given to the tractive units first, i.e. the trucks which pull semitrailers or trailers as with this type of trucks the dangers are more and when turning blind spots are unavoidable and cover bigger areas.
- The type of the body or the length of a truck are of relevance to the mirrors used. There are cases where the drivers cabin is relatively shorter in width than the rear body.

- The amount of money which will be given by the EU to retrofit new mirrors, to be able to be used to install other means for indirect vision like cameras (especially for tractive units) by using this amount as a subsidization to the total cost of such indirect method of vision.
- Instead of installing this type of mirrors, it should be investigated whether other type of mirrors can be installed as well (like the ones which turn automatically according to the steering angle of the truck's steering wheels).