

GDV contribution.txt

From: Kühn, Dr. Matthias
Sent: mercredi 10 mai 2006 13:38
To: TREN E3 CONSULTATION
Cc: Brockmann, Siegfried; Becker, Ariane; Malczyk, Axel; Köppel, Werner
Subject: PS Consultation on "Fitting Blind-Spot-Mirrors on Existing Trucks" A21791

Dear Sir or Madam,

After reviewing the consultation paper on "Fitting Blind-Spot Mirrors on Existing Trucks" we would like to comment on this paper as follows (question 4):

We support the standpoint that existing trucks up to the suggested year of first registration should be equipped with exterior rearview mirrors offering better vision and reducing the blind-spot area. We believe that this can be an important prerequisite to reduce the number of accidents between heavy vehicles and pedestrians or cyclists in the EU.

At the same time, we suggest that research is carried out or existing research is reviewed regarding how conspicuity of vulnerable road users is improved by these mirrors in practice. Although the described mirrors may theoretically provide a larger field of vision it still requires the vehicle driver to look into the right mirror at the right time to notice and recognize a pedestrian or cyclist to take preventive action. As the mirrors may not show the person in full, distorted or very small by wide-angle effects of the mirror glass or only for a very short period of time a driver may not properly detect such a person. These human factor influences should be studied to make fully utilize the technical benefits of fitting and retrofitting heavy vehicles with better exterior rearview mirrors.

In this context, it may be advisable to check the resulting fields of vision during a typical right-turning maneuver when the truck or semi-tractor is not in a straight line with the trailer or semi-trailer. The resulting field of vision may differ from the one shown in "Figure 1: Field of indirect vision ..." on page 6 of the consultation paper with the truck and trailer in a straight line.

Yours faithfully,

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