



**European Commission
Directorate General for Energy and Transport
Road Safety Unit
"Blind Spot"**

Date: 19-5-06

Subject: Comments on Blind Spot Mirrors Consultation Paper 12 April 2006

Dear Mr. Schmitz,

Thank you for publishing the Blind Spot Mirrors Consultation Paper on internet on 12th of April 2006. In this paper you are asking for comments.

For the quality of life of young children, their parents and elderly people it is of great importance to implement this EC regulation for blind spot mirror on existing trucks as soon as possible. As we read the draft regulation is foreseen for all trucks in the 25 member states. The main regulation is asking for replacement of existing mirror. Because of the fact that it is not possible to replace mirrors on all trucks the draft regulation is excluding trucks based on the age of the truck, the construction or for special trucks. So the proposed regulation covers not all existing trucks and is also diminishes the field of vision that is required in the regulation for new trucks.

In view of social responsibility it is of great importance to settle the regulation on short notice. We are asking you for a regulation that is:

- Based on the minimum required field of vision as mentioned in the European Regulation for new trucks (2003/97/EC)
- Allowing all type of mirrors with a European type approval conform 2003/97/EC so not only replacement of complete mirrors / housing or mirror glasses, but also allowing an additional in- or outside blind spot mirror.
- Giving the lowest investment for the truck owners and controlled quality of used view systems (opening all trade facilities to clear the job in short notice with all EC approved blind spot mirrors).

And if possible in the working field of this regulation also

- Measurements to give balanced blind spot instruction/training to truck drivers as well to potential risks groups for blind spot accidents: school kids, their parents and elderly people.

The DOBLI®-Blind spot mirror is an **efficient and low cost solution** for maximum coverage of the blind spot. The **area covered is even larger than the new EU legislation** for new trucks. DOBLI® has been supplied more than 200.000 times. Therefore GrootJebbink has a lot of experience in the problems regarding the blind spot. We would be glad to share our knowledge for a better road safety in the entire European platform.

May we trust that the above mentioned remarks may lead to safer roads and a higher quality of life in Europe?

Sincerely yours,
GrootJebbink BV

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