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From: Keune Martin  
Sent: vendredi 12 mai 2006 10:41  
To: TREN E3 CONSULTATION  
Subject: PS Comments on the paper "FITTING BLIND-SPOT MIRRORS ON EXISTING TRUCKS" A21805

Comments on the paper "FITTING BLIND-SPOT MIRRORS ON EXISTING TRUCKS"  
as published at  
[http://ec.europa.eu/transport/road/library/consultations/consultation\\_paper\\_blind\\_spot\\_20060411.pdf](http://ec.europa.eu/transport/road/library/consultations/consultation_paper_blind_spot_20060411.pdf)

Dear Commission,

as a founder of a private initiative in Berlin, Germany, which collected money and donated 100 blind-spot-mirrors to truck owners back in 2004/5, I'm no part of the producing or manufacturing industry, but a private person and father who is very interested and engaged in the mentioned theme.  
Since I already put about one hundred mirrors on trucks of all types and ages I guess I can very well judge the effects and costs of the different mirror types.

So please let me answer Your questions as a private person, too.

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

The benefits of retrofitting are the higher, the better the mirror works. In october 2004 we tested a clip-in-mirror manufactured by MEKRA and the front mirror DOBLI both together on the same Mercedes Atego truck in the presence of Berlin senator for urban development, Ingeborg Junge-Reyer. While the DOBLI mirror covered nearly the whole blind spot area, the clip-in-mirror still left a blind spot big enough for a group of 20 pupils. It just halved the dangerous area. Since that experience, I focussed my activities on front mirrors like DOBLI. For me, it seemed to be obvious that the bigger the left blind area will be, the more persons will take damage in that area. So please make sure that front mirrors are allways remembered as best possible solution for the problem!

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

In my opinion, the discussion of alternative solutions discusses the best solutions as alternatives while the main solution is worse. If front mirrors like the DOBLI cover the biggest part of the blind spot area, they might not be discussed as "could sometimes also be", but as best case solution. Also, front mirrors are a good solution for trucks with a mounting height lower than 2 m: while mirrors on the side of the track may cause danger if mounted lower than 2 metres, front mirrors are pressed flat in case of accident and may not cause additional damage that way.  
I am sure that front mirrors also minimize the range of excluded trucks very much, so the national laws should exclude only trucks that can not be retrofitted with front mirrors. That might be only a few!

3

As mentioned above, the number of excluded trucks could be much smaller. My initiative put blind spot mirrors on 40 year old "Robur" busses of the GDR as well as on rolling bibliothèques, fireengines, etc.  
It's reported that the netherlands are planning to put blind spot mirrors even on military tanks (!) so it's hard to imagine which kind of truck could not be equipped with at least a front mirror.  
For me, no exclusion is the best solution!

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

In adding the costs of deaths and damages, one should remember that today there

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are dozens of initiatives, hundreds of organisations and thousands of teachers working very hard in schools to teach the children that the blind spot is a big danger for them. Although most of these efforts are not paid by anyone, there are some ten thousand hours of traffic education that cause social costs in an indirect way and could be used for other necessary traffic education as well.

Back in 2004, the German upper house (the Bundesrat) already formulated a national decree (2004/209/D and 2004/226/D) to retrofit existing trucks. This decree was stopped after your intervention. If the European Parliament comes to the common opinion that retrofitting is necessary, a clear signal from your commission to Germany would be very helpful, stating that the work on this decree is now wanted and could continue. Otherwise we would lose much time in starting the whole discussion a new time in which some other bikers and children would lose health and lives in the blind spots of trucks.

Thank you very much for your continuing interest in that subject;  
best regards

Martin Keune