THE NETHERLANDS
(N E D E R L A N D)

E4

COMMUNICATION

Concerning [1]:

- approval granted
- ~~approval extended~~
- ~~approval refused~~
- ~~approval withdrawn~~
- ~~production definitively discontinued~~

of a type of safety-belt or restraint system for adult occupants of power-driven vehicles pursuant to Regulation number 16.

Approval number: E4*16R07/00*45913*00

1.	~~Restraint system (with)/three-point belt/lap belt~~/special type belt/~~fitted (with) energy absorber/retractor/device for height adjustment of the upper pillar loop/flexible shoulder adjustment device for height~~ [2]		
2.	Trade name or mark	:	KS28
3.	Manufacturer's designation of the type of belt or restraining system	:	KS28.418
4.	Manufacturer's name	:	Quanzhou Kwok Shing Automobile Subassembly Co., Ltd.
5.	If applicable, name of his representative	:	---
6.	Address	:	Quanzhou Kwok Shing Automobile Subassembly Co., Ltd. Kwok Shing Mansion, Wanggong Industrial Area, 362000 Quanzhou City, Fujian Province. China(PRC)
7.	Submitted for approval on	:	03.01.2019
8.	Technical service responsible for conducting approval tests	:	IDIADA Automotive Technology, S.A. L'Albornar, P.O. Box 20 43710 Santa Oliva (Tarragona) Spain

Approval number: E4*16R07/00*45913*00

9. Date of test report issued by that service : 25.10.2019

10. Number of test report issued by that service : CN18090199

11. Type of device : deceleration/~~acceleration~~ (1)

12. Approval : granted/~~refused~~/~~extended~~/~~withdrawn~~ (1)/ ~~for fixation to the general anchorage positions as defined in Annex 6, figure 1 to this Regulation~~/for use in a specific vehicle or in specific types of vehicles (1) (3)

12.1. In case a restraint system has been ~~granted~~/~~extended~~ (1), those can be used for particular types of vehicles compatible with the following dimensional conditions: no interior part in a quoted A-zone as shown below (Figure 2): Not applicable

:

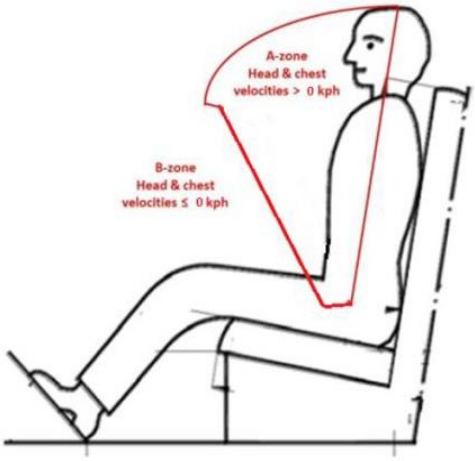


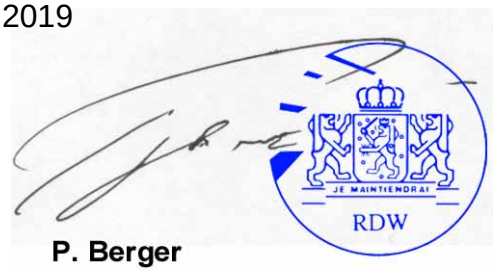
Figure 2

13. Position and nature of the marking : Label stitched on the belt

14. Place : Zoetermeer

15. Date : 01 November 2019

16. Signature :



P. Berger

17. Annexed to this communication is a list of documents in the approval file deposited at Type Approval Authorities having delivered the approval and which can be obtained upon request.
- Application form, relating to ECE approval for a type of safety belt or restraint system pursuant to Regulation number 16.
- Description including drawings and specifications.
- Test report.

(1) Strike out what does not apply.
(2) Indicate which type.
(3) If a safety-belt is approved following the provisions of paragraph 6.4.1.3.3. of this Regulation, this safety-belt shall only be installed in an outboard front seating position protected by an airbag in front of it, under the condition that the vehicle concerned is approved to Regulation number 94, 01 series of amendments or its later version in force.
If a safety-belt is approved following the provisions of paragraph 6.4.1.3.4. of this Regulation, this safety-belt shall only be installed in a seating position protected by an airbag in front of it.

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TECHNICAL DOCUMENTATION

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INFORMATION DOCUMENT No.: KS28.418
ECE Regulation 16.07 Part I (component approval)

0.	GENERAL		
0.1.	Make (trade name of manufacturer)	:	(KS28)
0.2.	Type and general commercial description(s)	:	**KS28.418**
0.3.	Name and address of manufacturer	:	Quanzhou Kwok Shing Automobile Subassembly Co., Ltd., Kwok Shing Mansion, Wanggong Industrial Area, 362000 Quanzhou City, Fujian Province. China(PRC)
0.4	name of his representative	:	Quanzhou Fuxing Plastic Hardware Co., Ltd
0.5.	In the case of components and separate technical units, location and method of affixing of the EC/ECE approval mark	:	Label stitched on the belt.
0.6.	Address(es) of assembly plant(s)	:	Same as above item 0.5

1. LIST OF VEHICLE(S) TO WHICH THE DEVICE IS INTENDED TO BE FITTED (if applicable)

Make	:	EMAN
Vehicle type	:	EMAN
Vehicle category	:	~~M1~~/M2/M3
Location	:	Passenger seats（inner and outer）
Seat Make	:	RZR
Seat type	:	RZR

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2. DESCRIPTION OF THE DEVICE

2.1. Safety belt

2.1.1.	Configuration of safety belt (two-point belt, three-point belt, static, automatic)	:	The assembly is a 4 points lap and shoulder configuration providing pelvic and upper torso restraint.
	Anchorage points	:	1 anchorage point for the upper left fixing– anchor bracket, 1 anchorage point for the upper right fixing– anchor bracket, 1 anchorage point for the lower left fixing-tongue, 1 anchorage point for the lower right fixing - buckle assembly; All of the above anchorage points are located on the seat structure.

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2.1.2. Details of webbing

Long-end assembly	:	
Length:	:	1700 ±50mm
Material	:	Polyester, Piece Dyed
Weaving pattern	:	2:2 Broken Twill (5 Panel)
Width	:	47.0 – 49.0mm
Colour	:	BLACK
Reference (P/N etc.)	:	SY-ZD-01A
Buckle assembly	:	No
Length:	:	---
Material	:	---
Weaving pattern	:	---
Width	:	---
Colour	:	---
Reference (P/N etc.)	:	---

2.1.3. Type of retractor (designation of retractor as per item 1.1.3.2.2 of Annex III to Directive 77/541/EEC) : Not applicable
Mechanism :
Vehicle Sensitivity :
Webbing Sensitivity :
Inclination in relation to transversal plane :
Inclination in relation to longitudinal plane :
Reference : -

2.1.3.1. Information on additional functions, if applicable : Not applicable

2.1.4. Drawing of the rigid parts (as per item .1.2.1 of Annex I to Directive 77/541/EEC) :

Description	Part Number	Page
Tongue assembly	KS28.209.1.1.1	8
Belt anchor bracket	KS28.418.1.1-1	9
Mini Belt adjusting device	---	9
Belt adjusting device	---	9
The lock assembly	KS28.418.2.1	10
Webbing details	---	11
E-mark label drawing	---	12

Note: Part numbers are moulded on the each part

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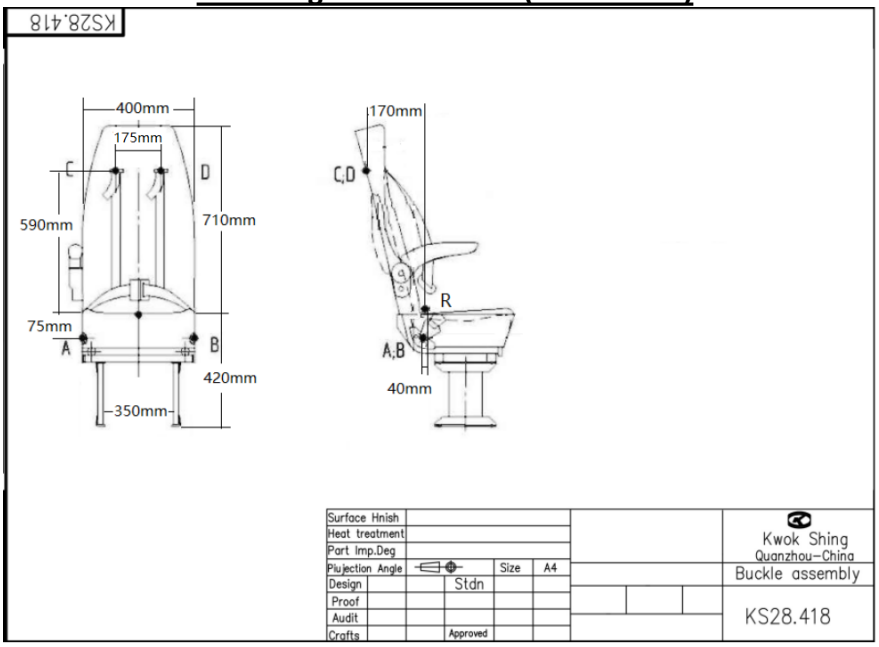
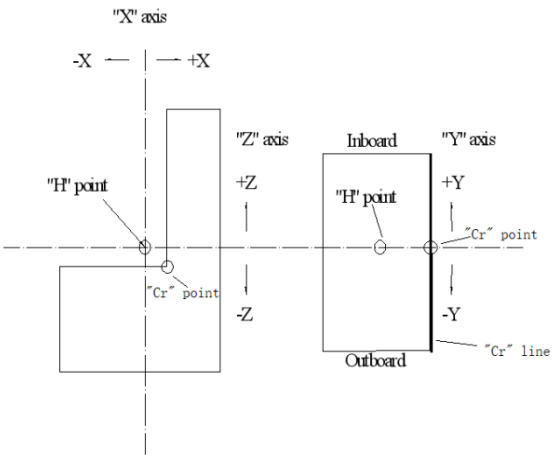
2.1.5. Diagram of the safety belt assembly enabling identification and location of rigid parts :

Description	Part Number	Page
Photograph of the safety-belt assembly	KS28.418	5
Long-end assembly	KS28.418.1	6
Buckle assembly	KS28.418.2	7

2.1.6. Mounting instructions showing, inter alia, the installation of the retractor and its sensing device :

Anchorage Point Details (Installation)





"H" point coordinates related to "Cr" point: X=-115 Y=0 Z=120

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Each anchorage points in relation to H-point(in mm)	(Transverse) "X" – AXIS (L)	(Longitudinal) "Y" – AXIS (W)	(Horizontal) "Z" – AXIS (H)
A	40	-200	-75
B	40	200	-75
C	170	-87.5	590
D	170	87.5	590

2.1.7. If a device for adjusting the belt height is present, state whether it is considered to be part of the belt : Not applicable
Travel : ---
Number of positions : ---
Assembly bolts : ---

2.1.8. In the case of a pre-loading device or system, a full technical description of the construction and function including any sensing device, describing the method of activation and any necessary method to avoid inadvertent activation : Not applicable

2.2. Restraint system Not applicable
In addition to the information required in 2.1 above

2.2.1. Drawing of the relevant parts of the vehicle and any seat anchorage reinforcements :

2.2.2. Drawing of the seat, showing its structure, adjustment system and fixing components, with an indication of the material used :

2.2.3. Drawing or photograph of the restraint system as installed :

2.3. Child restraint system Not applicable

Note : This seat belt is not made up of materials with properties of Polyamide 6 as regards water retention.
These materials are prohibited in all mechanical parts for which such a phenomenon is likely to have an adverse effect on their operation.

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Photograph of the safety-belt assembly

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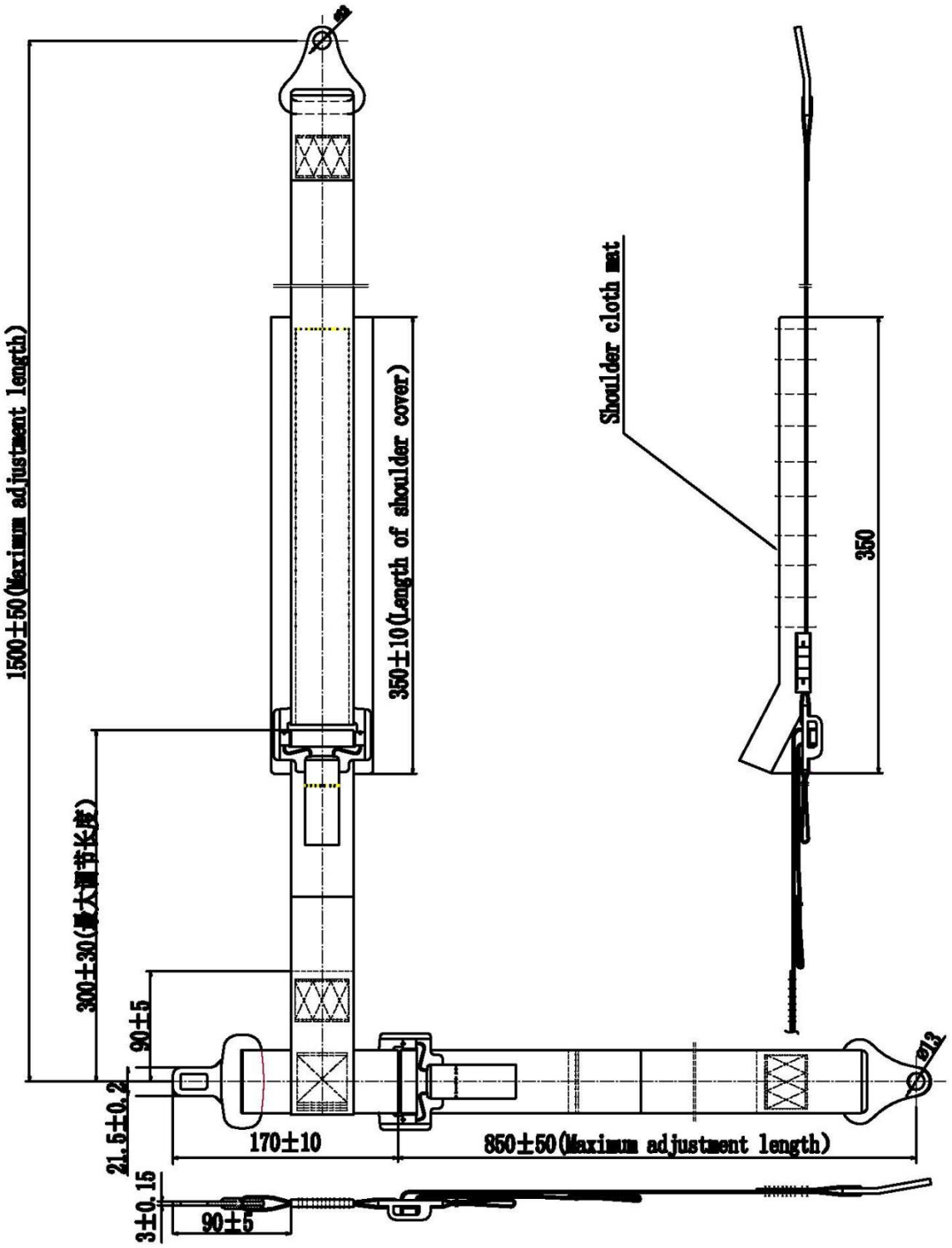
Long-end assembly



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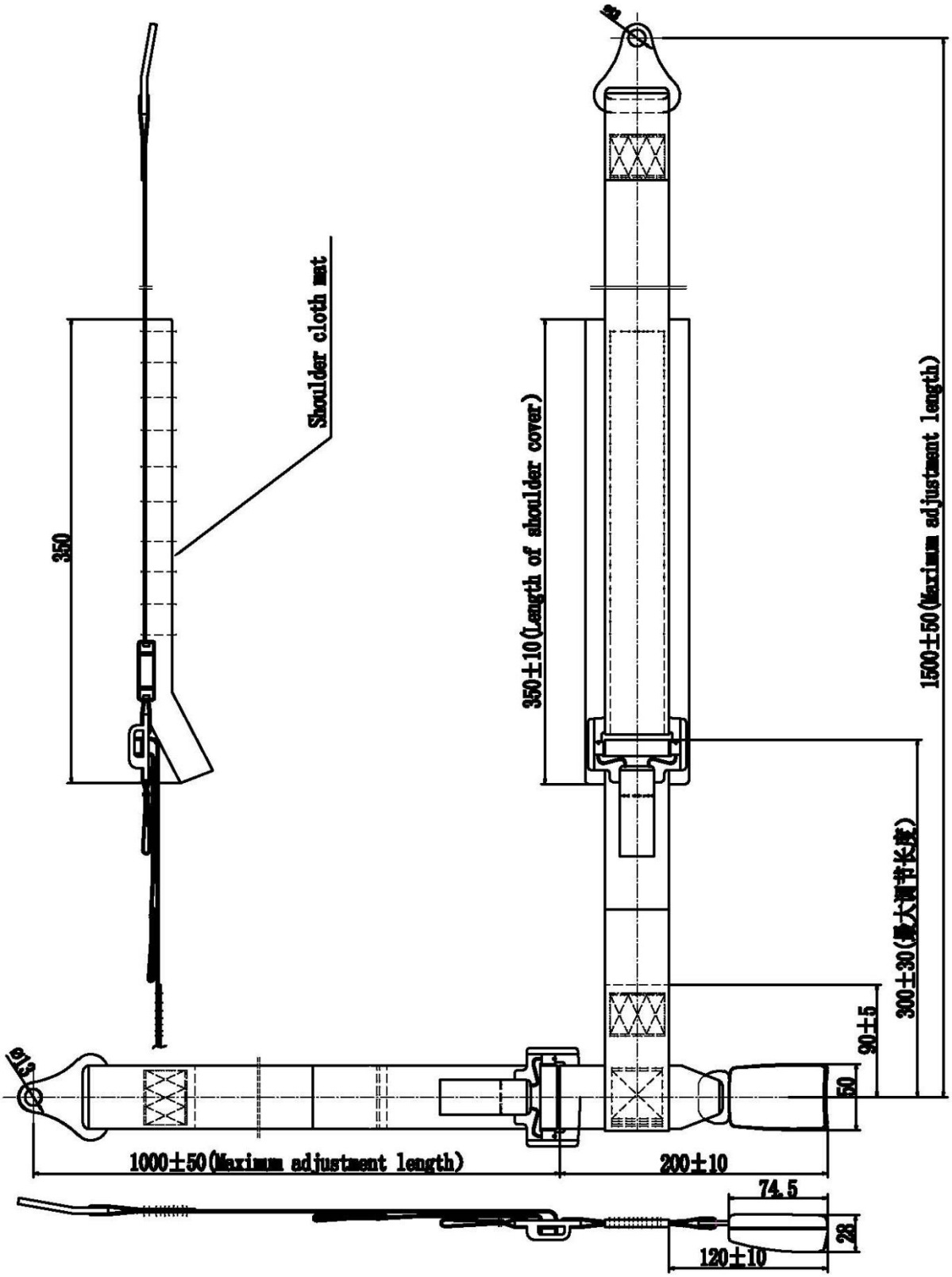
Buckle assembly



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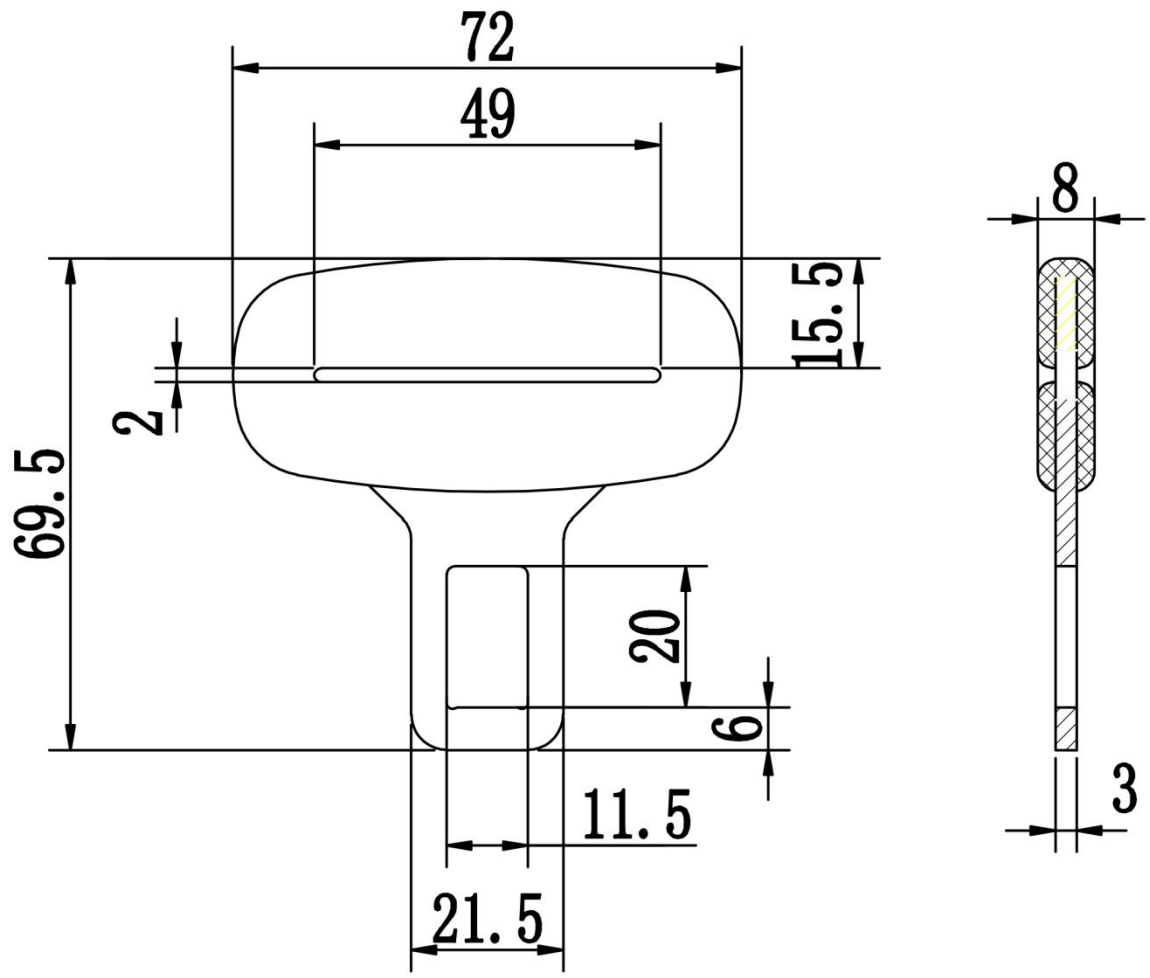
Tongue assembly



Material description:
1:45# steel, heat treatment HRC 38-43, chrome-plated surface;
2: plastic wrap material: ABS.

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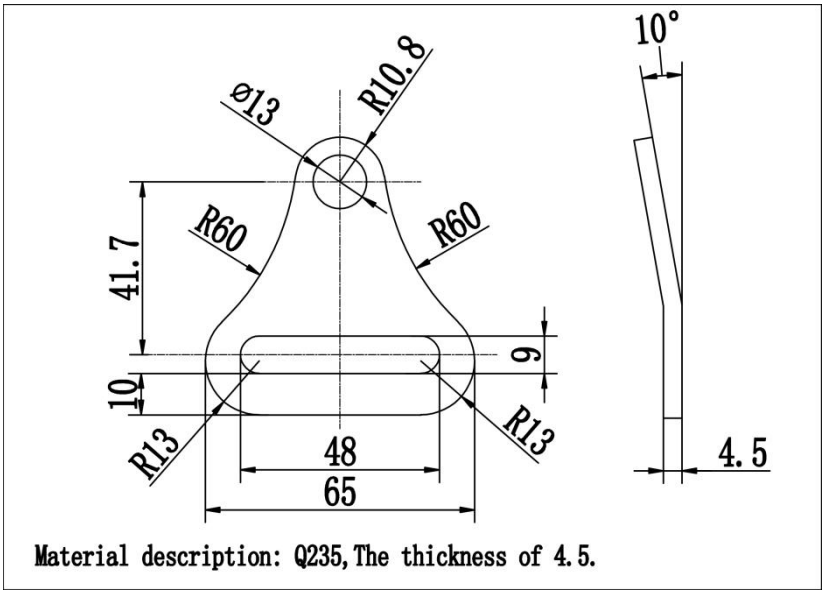
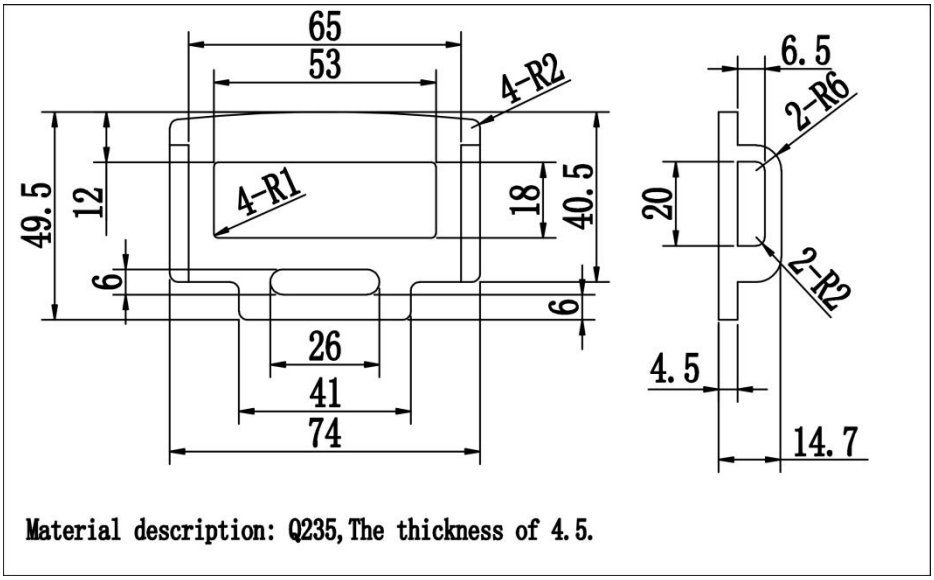
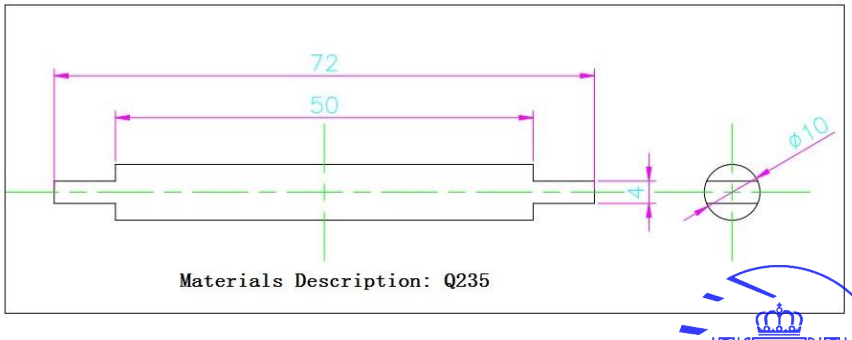
Belt anchor bracket



Belt adjusting device



Belt adjusting pin



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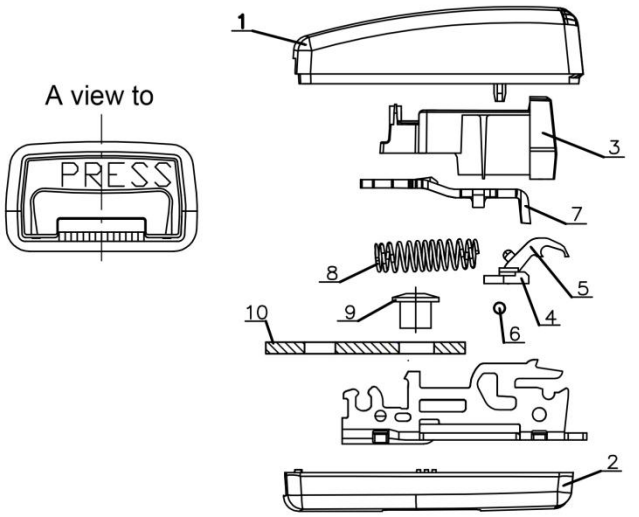
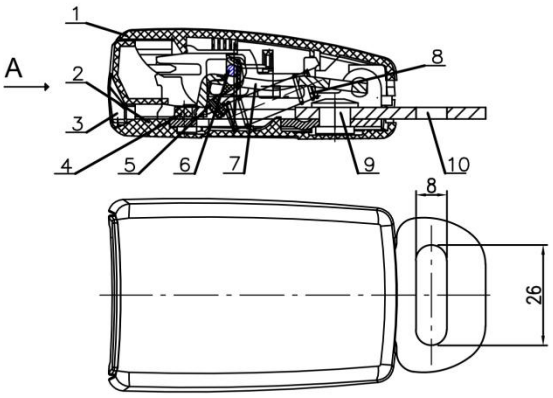
The lock assembly

KS28.418.2.1





No.	Drawing Number	Part Description	Qty	Material	Remarks
10	KS28.256B.2.1-1	Buckle plate	1	45#	
9	KS28AM.2-10	Rivet	1	45#	
8	KS28AM.2-9	Lock plate spring	1	1Cr18Ni9/GB1220-84	
7	KS28AM.2-7	Lock plate	1	45#	
6	KS28AM.2-6	Balance bar	1	45#	
5	KS28AM.2-5	Connector	1	POM	
4	KS28AM.2-4	Even actuator	1	POM	
3	KS28AM.2-3	Push button	1	POM	
2	KS28AM.2-2	Under Cover	1	ABS	
1	KS28AM.2-1	Superstructure	1	ABS	

Surface Hnish		Kwok Shing Quanzhou-China	
Heat treatment			
Part Imp.Deg			
Plujection Angle	Size A4	Buckle assembly	
Design	Stdn		
Proof		KS28.418.2.1	
Audit			
Crafts	Approved		

Special Notes

1. Riveting joint should be secured.
   Breaking strength of buckle assembly 2.000 daN minimum.
2. performance of buckle assembly should meet the requirements of ECE R 16-06,EEC77/541 ff(2005/40),FMVSS 209,ADR4/03.
3. After assembly,pressbutton should be flexible,buckle shall be struectured without half latching.
4. The colour of press button shall be red and marked with "PRESS" All other visible plastic parts colour shall be black.

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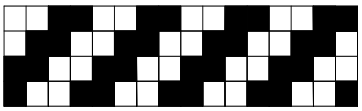
Webbing details

Material	Polyester
Webbing specification	SY-ZD-01A
Color	Black
Weaving pattern	
Warp yarn	1111dtex
Weft yarn	555dtex
Thread count	Warp: 70-80,Weft:19-21picks/inch
Width	47~49mmm
Thickness	1.3~1.4mm

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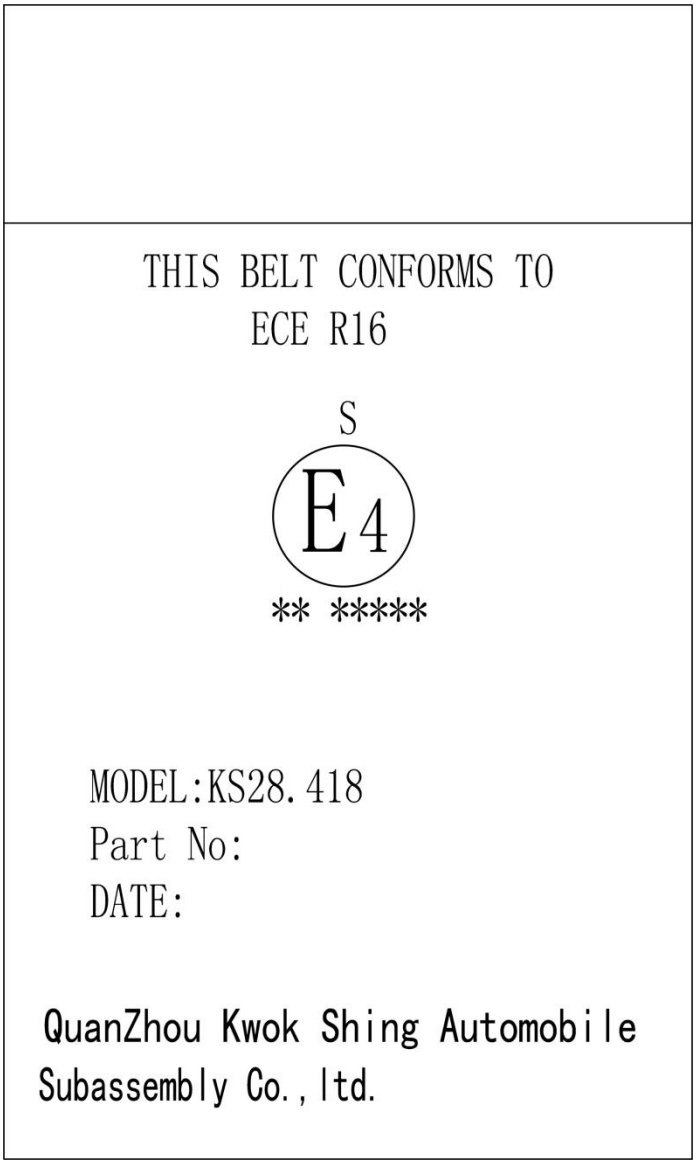
E-mark label drawing



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e-mail: idiada@idiada.com

REPORT No. CN18090199

UN REGULATION No.16 RELATED TO SAFETY-BELTS

Approval number	:	E4*16R07/00*45913*00
Applicant	:	Quanzhou Kwok Shing Automobile Subassembly Co., Ltd. Kwok Shing Mansion, Wanggong Industrial Area, 362000 Quanzhou City, Fujian Province. China(PRC)
Manufacturer	:	Quanzhou Kwok Shing Automobile Subassembly Co., Ltd.
Make	:	KS28
Type	:	KS28.418
Category	:	S
Place and date of issue of report	:	L'Albornar, Santa Oliva (Tarragona), 25/10/2019

CONCLUSIONS: The ~~vehicle~~/component/~~separate technical unit~~([1]) tested FULFILS the uniform provisions concerning the approval of safety belts of motor vehicles, provided for in UNECE UN REGULATION No.16 Supplement 00 to the 07 series of amendments

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Performed by

Xiaoren (kevin) Wang
HOMOLOGATION ENGINEER

Revised by:

Lluís Sans Gomis
DEPARTMENT MANAGER

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* THE PRESENTED RESULTS REFER ONLY TO THE TESTED SAMPLE
* THE PARTIAL REPRODUCTION OF THIS REPORT WITHOUT THE PERMISSION OF IDIADA IS COMPLETELY FORBIDDEN

ANNEX TO THE REPORT

Applicant	:	Quanzhou Kwok Shing Automobile Subassembly Co., Ltd. Kwok Shing Mansion, Wanggong Industrial Area, 362000 Quanzhou City, Fujian Province. China(PRC)
Make	:	KS28
Type	:	KS28.418
Category	:	S
Reference of the sample tested	:	KS28.418 1#/2#/3#/4#/5#
Sample reception date	:	15/01/2019

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1. TEST PERFORMANCE

Paragraphs	Requirements and test description	Sample	Result of examination
6.1	General specifications		
6.1.2 6.1.3	The belt or the restraint system is so designed and constructed that, when correctly installed and properly used by an occupant, its satisfactory operation is assured and it reduces the risk of bodily injury in the event of an accident. The straps of the belt are not liable to assume a dangerous configuration.	1	Complying
6.2	Rigid parts		
6.2.1	General		
6.2.1.1	The rigid parts of the safety-belt, such as buckles, adjusting devices, attachments and the like, have no sharp edges liable to cause wear or breakage of the straps by chafing.	1	Complying
6.2.1.2	All parts of the belt assembly liable to be affected by corrosion are suitably protected against it. After undergoing the corrosion test prescribed in paragraph 7.2., no signs of deterioration likely to impair the proper functioning of the device or any significant corrosion is visible to the unaided eye of a qualified observer.	1,2	Complying
6.2.1.3	Rigid parts intended to absorb energy or to be subjected to or to transmit a load are not fragile.	1,2	Complying
6.2.1.4	The rigid items and parts made of plastics of a safety-belt are so located and installed that they are not liable, during every day use of a power-driven vehicle, to become trapped under a moveable seat or in a door of that vehicle.	1,2	Complying

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6.2.2	Buckle		
6.2.2.1	The buckle is so designed to preclude any possibility of incorrect use. This means, inter alia, that it is not possible for the buckle to be left in a partially-closed condition. The procedure for opening the buckle is evident. The parts of the buckle likely to contact the body of the wearer present a section of not less than 20 cm^2 and at least 46 mm in width, measured in a plane situated at a maximal distance of 2.5 mm from the contact surface.	1,2,3,4, 5	Complying Dimension which contact to wearer: Width:49.9mm Area:37.1 cm^2
6.2.2.2	The buckle, even when not under tension, remains closed whatever the position of the vehicle. It is not be possible to release the buckle inadvertently, accidentally or with a force of less than 1 daN. The buckle is easy to use and to grasp; when it is not under tension and when under tension, it is capable of being released by the wearer with a single simple movement of one hand in one direction; in addition, in the case of belt assemblies intended to be used for the front outboard seats, it is capable of being engaged by the wearer with a simple movement of one hand in one direction. The buckle can be released by pressing either a button or a similar device. The surface to which this pressure is applied has the following dimensions, with the button in the actual release position and when projected into a plane perpendicular to the button's initial direction of motion: for enclosed buttons, an area of not less than 4.5 cm^2 and a width of not less than 15 mm; for non-enclosed buttons, an area of not less than 2.5 cm^2 and a width of not less than 10 mm. The buckle release area is coloured red. No other part of the buckle is of this colour.	1,2,3,4, 5	Complying Buckle release force:2.0 daN enclosed release button: Area:6.7 cm^2 Width: 22 mm
6.2.2.3	The buckle, when tested in accordance with paragraph 7.5.3, operates normally.	1,2	Complying
6.2.2.4	The buckle is capable of withstanding repeated operation.	1,2	Complying
6.2.2.6	The buckle has been tested for strength as prescribed in paragraphs 7.5.1. and, where appropriate, 7.5.5. It did not break, was not seriously distorted or became detached under the tension set up by the prescribed load (980 daN).	3	Complying Buckle strength: 1920 daN
6.2.2.7	For the buckles which incorporate a component common to two assemblies, the strength and release tests of paragraphs 7.7. and 7.8. have also be carried out with the part of the buckle pertaining to one assembly being engaged in the mating part pertaining to the other, if it is possible for the buckle to be so assembled in use.	3	n.a.
6.2.3	Belt adjusting device		
6.2.3.1	The belt after being put on by the wearer, ~~adjust automatically to fit him /~~ is such that the manually adjusting device is readily accessible to the seated wearer and is convenient and easy to use. It also allows the belt to be tightened with one hand to suit the wearer's body size and the position of the vehicle seat. (check whether three-point belt or lap belt)		
6.2.3.2	Two samples of each belt adjusting device have been tested in accordance with the requirements of paragraph 7.3. The		Complying

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	strap slip as shown did not exceed 25 mm for each sample of adjusting device and the sum of shifts for all the adjusting devices did not exceed 40 mm. (in case of lab belt, fulfilled)	4	adjuster： Strap slip:6.5mm
		4	adjuster ： Strap slip:6.0mm
		4	adjuster： Strap slip:6.0mm
		4	adjuster ： Strap slip:7.0mm
		Sum of shifts:25.5mm	
		5	adjuster： Strap slip:7.5mm
		5	adjuster ： Strap slip:8.0mm
		5	adjuster： Strap slip:6.5mm
		5	adjuster ： Strap slip:5.0mm
		Sum of shifts:27.0mm	
6.2.3.3	All the adjustment devices have been tested for strength as prescribed in paragraph 7.5.1. They did not break or become detached under the tension set up by the prescribed load. (in case of lab belt, fulfilled)	3	Complying
6.2.3.4	During test in accordance with paragraph 7.5.6. the force required to operate any manually adjusting device did not exceed 5 daN. (in case of lab belt, fulfilled)		Complying
		4	adjuster : 3.4 daN
		4	adjuster : 2.9 daN
		4	adjuster : 3.3 daN
		4	adjuster :3.7 daN
		5	adjuster : 3.2 daN
		5	adjuster : 3.5 daN
		5	adjuster : 3.1 daN
		5	adjuster: 3.9 daN
6.2.4	Attachments and belt adjustment devices for height. The attachments have been tested for strength as prescribed in paragraphs 7.5.1. and 7.5.2. These parts did not break or became detached under the tension set up by the prescribed load.	3	Complying Lower Anchor:2070daN adjuster:1860daN
6.2.5	Retractors: Not applicable		

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<table>
<tr><td>6.3</td><td colspan="5">Straps</td></tr>
<tr><td rowspan="11">6.3.1.2
6.3.2
6.3.3</td><td rowspan="11">The width of the strap under load of 980 daN was not less than 46 mm. This dimension has been measured during the breaking-strength test prescribed in paragraph 7.4.2. and without stopping the machine.

Strength after room-conditioning
The breaking load of two straps samples conditioned in conformity with paragraph 7.4.1.1, determined as prescribed in paragraph 7.4.2., have been not less than 1,470 daN. The difference between the breaking loads of the two samples did not exceed 10 per cent of the greater of the breaking loads measured.

Strength after special conditioning
In the case of the two strap samples conditioned in conformity with one of the provisions of paragraph 7.4.1. (except 7.4.1.1.), the breaking load of the strap was not less than 75 per cent of average of the loads determined in the test referred to in paragraph 6.3.2. (Strength after room-conditioning) and not less than 1,470 daN.</td><td>Sample</td><td>Conditioning</td><td>Breaking load of Strap (daN)</td><td>Width of strap (mm)</td></tr>
<tr><td>1’</td><td rowspan="2">room conditioning</td><td>2802</td><td>46.80</td></tr>
<tr><td>2’</td><td>2776</td><td>46.50</td></tr>
<tr><td>3’</td><td rowspan="2">light conditioning</td><td>2654</td><td>---</td></tr>
<tr><td>4’</td><td>2633</td><td>---</td></tr>
<tr><td>5’</td><td rowspan="2">cold conditioning</td><td>2621</td><td>---</td></tr>
<tr><td>6’</td><td>2643</td><td>---</td></tr>
<tr><td>7’</td><td rowspan="2">heat conditioning</td><td>2694</td><td>---</td></tr>
<tr><td>8’</td><td>2625</td><td>---</td></tr>
<tr><td>9’</td><td rowspan="2">exposure of water</td><td>2747</td><td>---</td></tr>
<tr><td>10’</td><td>2698</td><td>---</td></tr>
<tr><td>6.4.2.1</td><td>For both samples conditioned in compliance with paragraph 7.4.1.6, the breaking strength has been assessed as prescribed in paragraphs 7.4.2. and 7.5. It has been at least equal to 75 per cent of the breaking strength average determined during tests on unabraded straps and not less than the minimum load specified for the item being tested. Difference between breaking strength of the two samples have not exceeded 20 per cent of the highest measured breaking strength. For type 1 and type 2 procedures, the breaking strength test has been carried out on strap samples only (para. 7.4.2.). For type 3 procedure, the breaking strength test has been carried out on the strap in combination with the metal component involved (para. 7.5.).</td><td>Test procedure</td><td>Sample</td><td>breaking load of Strap (daN)</td><td>percent of difference (%)</td></tr>
<tr><td rowspan="2">2 (adjuster)</td><td>4</td><td>2649</td><td rowspan="2">95.0%</td></tr>
<tr><td>5</td><td>2651</td></tr>
</table>

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6.4	Belt assembly or restraint system		
6.4.1	Dynamic test: type of device: deceleration		
6.4.1.2	The dynamic test has been performed on two belt assemblies which have not previously been under load. ~~, except in the case of belt assemblies forming part of restraint systems when the dynamic test shall be performed on the restraint systems intended for one group of seats which have not previously been under load.~~ The buckles of the belt assemblies to be tested have met the requirements of paragraph 6.2.2.4. above. ~~In the case of safety-belts with retractors, the retractor has been subjected to the dust resistance test laid down in paragraph 7.6.3.; in addition, in the case of safety-belts or restraint systems equipped with a pre-loading device comprising pyrotechnic means, the device has been subjected to the conditioning specified in paragraph 7.9.2.~~		
6.4.1.2.1	The belts have undergone the corrosion test described in paragraph 7.2., after which the buckles have been subjected to 500 additional opening and closing cycles under normal conditions of use.		
6.4.1.2.2	~~Safety-belts with retractors have been subjected to the tests described in paragraph 6.2.5.2. or to those described in paragraph 6.2.5.3. If, however, a retractor has already been subjected to the corrosion test in accordance with the provisions of paragraph 6.4.1.2.1., above, this test has not repeated.~~		
6.4.1.2.3	~~In the case of a belt intended for use with a belt adjustment device for height, as defined in paragraph 2.9.6. above, the test has been carried out with the device adjusted in the most unfavourable position(s) chosen by the technical service responsible for testing.~~		
6.4.1.2.4	~~In the case of safety-belt with a preloading device the minimum displacement specified in paragraph 6.4.1.3.2. may be reduced by half. For the purpose of this test, the preloading device has been in operation.~~		
6.4.1.3	During this test, the following requirements shall be met:		
6.4.1.3.1	No part of the belt assembly or a restraint system affecting the restraint of the occupant did break and no buckles or locking system or displacement system did release or unlock;	1,2	Complying

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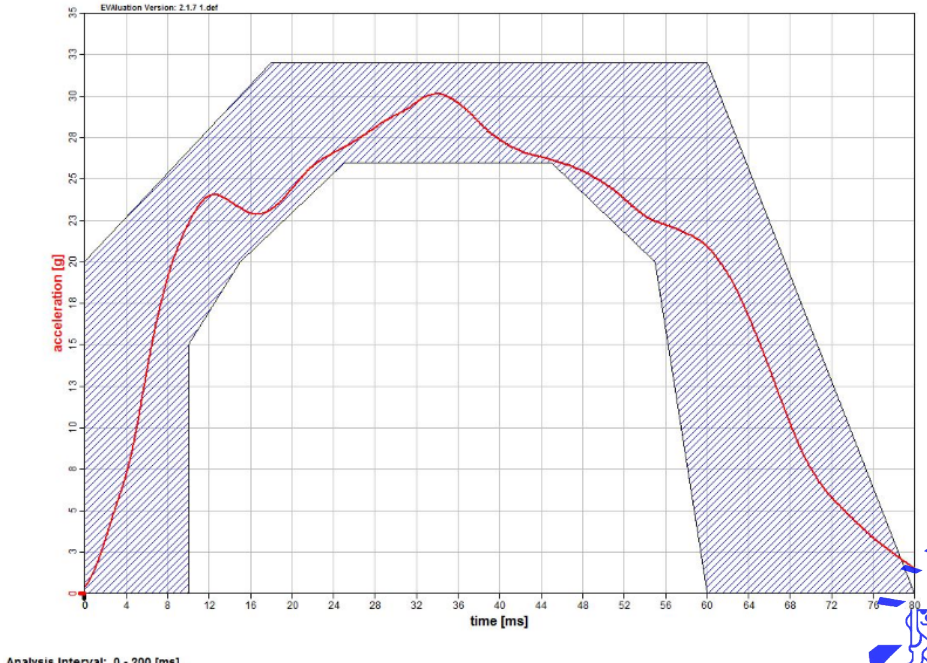
6.4.1.3.2 6.4.1.3.3 6.2.2.5	~~The forward displacement of the manikin shall be between 80 and 200 mm at pelvic level in the case of lap belts.~~ In the case of other types of belts, the forward displacement shall be between 80 and 200 mm at pelvic level and between 100 and 300 mm at chest level. In the case of a harness belt or safety-belt with a preloading device, the minimum displacements specified above may be reduced by half. ~~In the case of a safety-belt intended to be used in an outboard front seating position protected by an airbag in front of it, the displacement of the chest reference point may exceed that specified in paragraph 6.4.1.3.2. above if its speed at this value does not exceed 24 km/h. (worst case)~~ The force required to open the buckle in the test as prescribed in paragraph 7.8. shall not exceed 6 daN.	Sample	pelvic level (mm)	chest level (mm)	Velocity (km/h)	force to open the buckle after test (daN)
		1	130	155	49.72	3.84
		2	130	120	49.72	3.87
6.4.1.4	In the case of a restraint system		n.a.			

The anchorage points under test

Each anchorage points in relation to H-poin((in mm). the H-point under the test used as reference point in this test report	(Transverse) "X" – AXIS (L)	(Longitudinal) "Y" – AXIS (W)	(Horizontal) "Z" – AXIS (H)
A	65	-201	-90
B	65	201	-90
C	190	-100	590
D	190	100	590

First test



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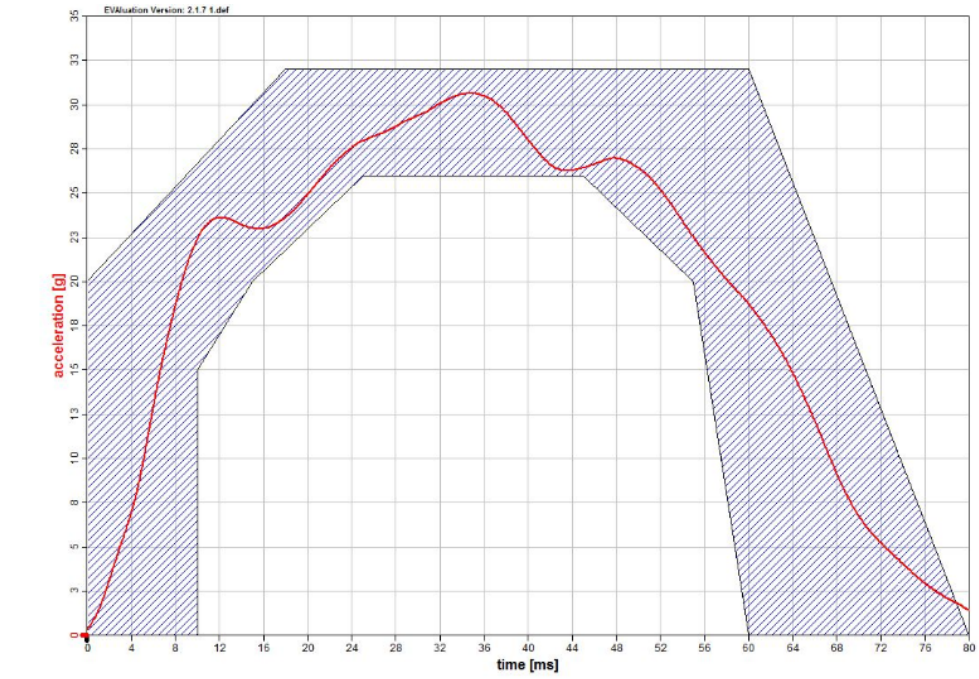
second test:



Analysis Interval: 0 - 200 [ms]
Max(34.75 ms) = 30.66 g; Min(124.5 ms) = -2.851 g

Place: Ningbo, China
Date: 27/06/2019~14/10/2019

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Xiaoren (kevin) Wang
HOMOLOGATION ENGINEER

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