Case No. 78701

In the Supreme Court of Nevada

MOTOR COACH INDUSTRIES, INC.,

Appellant,

VS.

KEON KHIABANI; ARIA KHIABANI, MINORS, by and through their Guardian MARIE-CLAUDE RIGAUD; SIAMAK BARIN, as Executor of the Estate of KAYVAN KHIABANI, M.D.; the Estate of KAYVAN KHIABANI; SIAMAK BARIN, as Executor of the Estate of KATAYOUN BARIN, DDS; and the Estate of KATAYOUN BARIN, DDS,

Respondents.

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APPEAL

from the Eighth Judicial District Court, Clark County The Honorable Adriana Escobar, District Judge District Court Case No. A-17-755977-C

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	Any Claims That the Subject Motor			
	Coach was Defective Based on Alleged			
	Dangerous "Air Blasts"			
34	Appendix of Exhibits to Defendants'	12/07/17	8	1817–2000
	Motion in Limine No. 13 to Exclude		9	2001–2100
	Plaintiffs' Expert Witness Robert			
	Cunitz, Ph.D., or in the Alternative, to			
	Limit His Testimony			

38	Appendix of Exhibits to Plaintiffs'	12/21/17	9	2176–2250
	Joint Opposition to MCI Motion for		10	2251-2500
	Summary Judgment on All Claims		11	2501–2523
	Alleging a Product Defect and to MCI			
	Motion for Summary Judgment on			
	Punitive Damages			
119	Appendix of Exhibits to: Motor Coach	05/07/18	48	11770–11962
	Industries, Inc.'s Motion for New Trial			
76	Bench Brief in Support of	02/22/18	22	5321–5327
	Preinstructing the Jury that			
	Contributory Negligence in Not a			
	Defense in a Product Liability Action			
67	Bench Brief on Contributory	02/15/18	18	4309-4314
	Negligence			
51	Calendar Call Transcript	01/18/18	11	2748 – 2750
			12	2751–2752
125	Case Appeal Statement	05/18/18	49	12098–12103
140	Case Appeal Statement	04/24/19	50	12462-12479
21	Civil Order to Statistically Close Case	10/24/17	3	587–588
127	Combined Opposition to Motion for a	06/08/18	49	12113–12250
	Limited New Trial and MCI's		50	12251–12268
	Renewed Motion for Judgment as a			
	Matter of Law Regarding Failure to			
	Warn Claim			
1	Complaint with Jury Demand	05/25/17	1	1–16
10	Defendant Bell Sports, Inc.'s Answer	07/03/17	1	140–153
	to Plaintiff's Amended Complaint			
11	Defendant Bell Sports, Inc.'s Demand	07/03/17	1	154-157
	for Jury Trial			
48	Defendant Bell Sports, Inc.'s Motion	01/17/18	11	2720–2734
	for Determination of Good Faith			
	Settlement on Order Shortening Time			
7	Defendant Motor Coach Industries,	06/30/17	1	101–116
	Inc.'s Answer to Plaintiffs' Amended			
	Complaint			
8	Defendant Sevenplus Bicycles, Inc.	06/30/17	1	117–136
	d/b/a Pro Cyclery's Answer to			
	Plaintiffs' Amended Complaint			

9	Defendant Sevenplus Bicycles, Inc. d/b/a Pro Cyclery's Demand for Jury Trial	06/30/17	1	137–139
19	Defendant SevenPlus Bicycles, Inc. d/b/a Pro Cyclery's Motion for Determination of Good Faith Settlement	09/22/17	2	313–323
31	Defendant's Motion in Limine No. 7 to Exclude Any Claims That the Subject Motor Coach was Defective Based on Alleged Dangerous "Air Blasts"	12/07/17	7	1572–1583
20	Defendant's Notice of Filing Notice of Removal	10/17/17	$\frac{2}{3}$	324–500 501–586
55	Defendant's Reply in Support of Motion in Limine No. 17 to Exclude Claim of Lost Income, Including the August 28 Expert Report of Larry Stokes	01/22/18	12	2794–2814
53	Defendant's Reply in Support of Motion in Limine No. 7 to Exclude Any Claims that the Subject Motor Coach was Defective Based on Alleged Dangerous "Air Blasts"	01/22/18	12	2778–2787
71	Defendant's Trial Brief in Support of Level Playing Field	02/20/18	19 20	4748–4750 4751–4808
5	Defendants Michelangelo Leasing Inc. dba Ryan's Express and Edward Hubbard's Answer to Plaintiffs' Amended Complaint	06/28/17	1	81–97
56	Defendants Michelangelo Leasing Inc. dba Ryan's Express and Edward Hubbard's Joinder to Plaintiffs' Motion for Determination of Good Faith Settlement with Michelangelo Leasing Inc. dba Ryan's Express and Edward Hubbard	01/22/18	12	2815–2817
33	Defendants' Motion in Limine No. 13 to Exclude Plaintiffs' Expert Witness	12/07/17	8	1802–1816

	D.1. 4 C .'4 Dl. 1' . 41.			
	Robert Cunitz, Ph.d., or in the			
0.0	Alternative, to Limit His Testimony	10/00/15		0100 0100
36	Defendants' Motion in Limine No. 17	12/08/17	9	2106–2128
	to Exclude Claim of Lost Income,			
	Including the August 28 Expert			
	Report of Larry Stokes			
54	Defendants' Reply in Support of	01/22/18	12	2788–2793
	Motion in Limine No. 13 to Exclude			
	Plaintiffs' Expert Witness Robert			
	Cunitz, Ph.D., or in the Alternative to			
	Limit His Testimony			
6	Demand for Jury Trial	06/28/17	1	98–100
147	Exhibits G–L and O to: Appendix of	05/08/18	51	12705–12739
	Exhibits to: Motor Coach Industries,		52	12740–12754
	Inc.'s Motion for a Limited New Trial			
	(FILED UNDER SEAL)			
142	Findings of Fact and Conclusions of	03/14/18	51	12490–12494
	Law and Order on Motion for			
	Determination of Good Faith			
	Settlement (FILED UNDER SEAL)			
75	Findings of Fact, Conclusions of Law,	02/22/18	22	5315–5320
	and Order			
108	Jury Instructions	03/23/18	41	10242-10250
			42	10251-10297
110	Jury Instructions Reviewed with the	03/30/18	42	10303-10364
	Court on March 21, 2018			
64	Jury Trial Transcript	02/12/18	15	3537-3750
			16	3751-3817
85	Jury Trial Transcript	03/06/18	28	6883-7000
			29	7001-7044
87	Jury Trial Transcript	03/08/18	30	7266–7423
92	Jury Trial Transcript	03/13/18	33	8026-8170
93	Jury Trial Transcript	03/14/18	33	8171-8250
			34	8251-8427
94	Jury Trial Transcript	03/15/18	34	8428-8500
			35	8501–8636
95	Jury Trial Transcript	03/16/18	35	8637-8750

			36	8751–8822
98	Jury Trial Transcript	03/19/18	36	8842-9000
			37	9001-9075
35	Motion for Determination of Good	12/07/17	9	2101–2105
	Faith Settlement Transcript			
22	Motion for Summary Judgment on	10/27/17	3	589–597
	Foreseeability of Bus Interaction with			
	Pedestrians or Bicyclists (Including			
	Sudden Bicycle Movement)			
26	Motion for Summary Judgment on	12/01/17	3	642–664
	Punitive Damages			
117	Motion to Retax Costs	04/30/18	47	11743–11750
			48	11751–11760
58	Motions in Limine Transcript	01/29/18	12	2998–3000
			13	3001–3212
61	Motor Coach Industries, Inc.'s Answer	02/06/18	14	3474–3491
	to Second Amended Complaint			
90	Motor Coach Industries, Inc.'s Brief in	03/12/18	32	7994–8000
	Support of Oral Motion for Judgment		33	8001–8017
	as a Matter of Law (NRCP 50(a))			
146	Motor Coach Industries, Inc.'s Motion	05/07/18	51	12673–12704
	for a Limited New Trial (FILED			
2.0	UNDER SEAL)	1010111	-	1 101 1 200
30	Motor Coach Industries, Inc.'s Motion	12/04/17	6	1491–1500
	for Summary Judgment on All Claims		7	1501–1571
1 4 5	Alleging a Product Defect	05/05/10	F 1	10045 10050
145	Motor Coach Industries, Inc.'s Motion	05/07/18	51	12647–12672
	to Alter or Amend Judgment to Offset			
	Settlement Proceed Paid by Other			
96	Defendants (FILED UNDER SEAL) Motor Coach Industries, Inc.'s	03/18/18	36	8823–8838
90	Opposition to Plaintiff's Trial Brief	09/10/10	อบ	0020-0000
	Regarding Admissibility of Taxation			
	Issues and Gross Versus Net Loss			
	Income			
52	Motor Coach Industries, Inc.'s Pre-	01/19/18	12	2753–2777
	Trial Disclosure Pursuant to NRCP	01/10/10	1 =	
	16.1(a)(3)			
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120	Motor Coach Industries, Inc.'s	05/07/18	48	11963–12000
	Renewed Motion for Judgment as a		49	12001-12012
	Matter of Law Regarding Failure to			
	Warn Claim			
47	Motor Coach Industries, Inc.'s Reply	01/17/18	11	2705–2719
	in Support of Its Motion for Summary			
	Judgment on All Claims Alleging a			
	Product Defect			
149	Motor Coach Industries, Inc.'s Reply	07/02/18	52	12865-12916
	in Support of Motion to Alter or			
	Amend Judgment to Offset Settlement			
	Proceeds Paid by Other Defendants			
	(FILED UNDER SEAL)			
129	Motor Coach Industries, Inc.'s Reply	06/29/18	50	12282-12309
	in Support of Renewed Motion for			
	Judgment as a Matter of Law			
	Regarding Failure to Warn Claim			
70	Motor Coach Industries, Inc.'s	02/16/18	19	4728-4747
	Response to "Bench Brief on			
	Contributory Negligence"			
131	Motor Coach Industries, Inc.'s	09/24/18	50	12322-12332
	Response to "Plaintiffs' Supplemental			
	Opposition to MCI's Motion to Alter or			
	Amend Judgment to Offset Settlement			
	Proceeds Paid to Other Defendants"			
124	Notice of Appeal	05/18/18	49	12086–12097
139	Notice of Appeal	04/24/19	50	12412-12461
138	Notice of Entry of "Findings of Fact	04/24/19	50	12396–12411
	and Conclusions of Law on			
	Defendant's Motion to Retax"			
136	Notice of Entry of Combined Order (1)	02/01/19	50	12373-12384
	Denying Motion for Judgment as a			
	Matter of Law and (2) Denying Motion			
	for Limited New Trial			
141	Notice of Entry of Court's Order	05/03/19	50	12480-12489
	Denying Defendant's Motion to Alter			
	or Amend Judgment to Offset			
	Settlement Proceeds Paid by Other			

	Defendants Filed Under Seal on			
4.0	March 26, 2019	01/00/10		
40	Notice of Entry of Findings of Fact	01/08/18	11	2581–2590
	Conclusions of Law and Order on			
	Motion for Determination of Good			
105	Faith Settlement	00/04/40		10007 10007
137	Notice of Entry of Findings of Fact,	02/01/19	50	12385–12395
	Conclusions of Law and Order on			
	Motion for Good Faith Settlement	0.11.01.0		10007 10071
111	Notice of Entry of Judgment	04/18/18	42	10365–10371
12	Notice of Entry of Order	07/11/17	1	158–165
16	Notice of Entry of Order	08/23/17	1	223–227
63	Notice of Entry of Order	02/09/18	15	3511–3536
97	Notice of Entry of Order	03/19/18	36	8839–8841
15	Notice of Entry of Order (CMO)	08/18/17	1	214–222
4	Notice of Entry of Order Denying	06/22/17	1	77–80
	Without Prejudice Plaintiffs' Ex Parte			
	Motion for Order Requiring Bus			
	Company and Bus Driver to Preserve			
	an Immediately Turn Over Relevant			
	Electronic Monitoring Information			
	from Bus and Driver Cell Phone			
13	Notice of Entry of Order Granting	07/20/17	1	166–171
	Plaintiffs' Motion for Preferential Trial			
	Setting			
133	Notice of Entry of Stipulation and	10/17/18	50	12361–12365
	Order Dismissing Plaintiffs' Claims			
	Against Defendant SevenPlus			
	Bicycles, Inc. Only			
134	Notice of Entry of Stipulation and	10/17/18	50	12366–12370
	Order Dismissing Plaintiffs' Claims			
	Against Bell Sports, Inc. Only			
143	Objection to Special Master Order	05/03/18	51	12495-12602
	Staying Post-Trial Discovery Including			
	May 2, 2018 Deposition of the			
	Custodian of Records of the Board of			
	Regents NSHE and, Alternatively,			
	Motion for Limited Post-Trial			

	Discovery on Order Shortening Time			
	(FILED UNDER SEAL)			
39	Opposition to "Motion for Summary	12/27/17	11	2524 - 2580
	Judgment on Foreseeability of Bus			
	Interaction with Pedestrians of			
	Bicyclists (Including Sudden Bicycle			
	Movement)"			
123	Opposition to Defendant's Motion to	05/14/18	49	12039–12085
	Retax Costs			
118	Opposition to Motion for Limited Post-	05/03/18	48	11761–11769
	Trial Discovery			
151	Order (FILED UNDER SEAL)	03/26/19	52	12931–12937
135	Order Granting Motion to Dismiss	01/31/19	50	12371–12372
	Wrongful Death Claim			
25	Order Regarding "Plaintiffs' Motion to	11/17/17	3	638–641
	Amend Complaint to Substitute			
	Parties" and "Countermotion to Set a			
	Reasonable Trial Date Upon Changed			
	Circumstance that Nullifies the			
	Reason for Preferential Trial Setting"			
45	Plaintiffs' Addendum to Reply to	01/17/18	11	2654–2663
	Opposition to Motion for Summary			
	Judgment on Forseeability of Bus			
	Interaction with Pedestrians or			
	Bicyclists (Including Sudden Bicycle			
4.0	Movement)"	04/40/40		
49	Plaintiffs' Joinder to Defendant Bell	01/18/18	11	2735–2737
	Sports, Inc.'s Motion for			
	Determination of Good Faith			
4.1	Settlement on Order Shortening Time	01/00/10		0501 0011
41	Plaintiffs' Joint Opposition to	01/08/18	11	2591–2611
	Defendant's Motion in Limine No. 3 to			
	Preclude Plaintiffs from Making			
	Reference to a "Bullet Train" and to			
	Defendant's Motion in Limine No. 7 to			
	Exclude Any Claims That the Motor			
	Coach was Defective Based on Alleged			
	Dangerous "Air Blasts"			

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37	Plaintiffs' Joint Opposition to MCI	12/21/17	9	2129–2175
	Motion for Summary Judgment on All			
	Claims Alleging a Product Defect and			
	to MCI Motion for Summary			
	Judgment on Punitive Damages			
50	Plaintiffs' Motion for Determination of	01/18/18	11	2738–2747
	Good Faith Settlement with			
	Defendants Michelangelo Leasing Inc.			
	d/b/a Ryan's Express and Edward			
	Hubbard Only on Order Shortening			
	Time			
42	Plaintiffs' Opposition to Defendant's	01/08/18	11	2612–2629
	Motion in Limine No. 13 to Exclude			
	Plaintiffs' Expert Witness Robert			
	Cunitz, Ph.D. or in the Alternative to			
	Limit His Testimony			
43	Plaintiffs' Opposition to Defendant's	01/08/18	11	2630–2637
	Motion in Limine No. 17 to Exclude			
	Claim of Lost Income, Including the			
	August 28 Expert Report of Larry			
	Stokes			
126	Plaintiffs' Opposition to MCI's Motion	06/06/18	49	12104–12112
	to Alter or Amend Judgment to Offset			
	Settlement Proceeds Paid by Other			
	Defendants			
130	Plaintiffs' Supplemental Opposition to	09/18/18	50	12310–12321
	MCI's Motion to Alter or Amend			
	Judgment to Offset Settlement			
	Proceeds Paid by Other Defendants			
150	Plaintiffs' Supplemental Opposition to	09/18/18	52	12917–12930
	MCI's Motion to Alter or Amend			
	Judgment to Offset Settlement			
	Proceeds Paid by Other Defendants			
	(FILED UNDER SEAL)			
122	Plaintiffs' Supplemental Verified	05/09/18	49	12019–12038
	Memorandum of Costs and			
	Disbursements Pursuant to NRS			
	18.005, 18.020, and 18.110			

91	Plaintiffs' Trial Brief Regarding	03/12/18	33	8018–8025
	Admissibility of Taxation Issues and			
	Gross Versus Net Loss Income			
113	Plaintiffs' Verified Memorandum of	04/24/18	42	10375–10381
	Costs and Disbursements Pursuant to			
	NRS 18.005, 18.020, and 18.110			
105	Proposed Jury Instructions Not Given	03/23/18	41	10207–10235
109	Proposed Jury Verdict Form Not Used	03/26/18	42	10298–10302
	at Trial			
57	Recorder's Transcript of Hearing on	01/23/18	12	2818–2997
	Defendant's Motion for Summary			
	Judgment on All Claims Alleging a			
	Product Defect			
148	Reply in Support of Motion for a	07/02/18	52	12755–12864
	Limited New Trial (FILED UNDER			
	SEAL)			
128	Reply on Motion to Retax Costs	06/29/18	50	12269–12281
44	Reply to Opposition to Motion for	01/16/18	11	2638–2653
	Summary Judgment on Foreseeability			
	of Bus Interaction with Pedestrians or			
	Bicyclists (Including Sudden Bicycle			
	Movement)"			
46	Reply to Plaintiffs' Opposition to	01/17/18	11	2664–2704
	Motion for Summary Judgment on			
	Punitive Damages			
3	Reporter's Transcript of Motion for	06/15/17	1	34–76
	Temporary Restraining Order			
144	Reporter's Transcript of Proceedings	05/04/18	51	12603–12646
	(FILED UNDER SEAL)			
14	Reporter's Transcription of Motion for	07/20/17	1	172–213
	Preferential Trial Setting			
18	Reporter's Transcription of Motion of	09/21/17	1	237–250
	Status Check and Motion for		2	251–312
	Reconsideration with Joinder			
65	Reporter's Transcription of	02/13/18	16	3818–4000
	Proceedings		17	4001–4037
66	Reporter's Transcription of	02/14/18	17	4038–4250
	Proceedings		18	4251–4308

68	Reporter's Transcription of	02/15/18	18	4315–4500
200	Proceedings	00/10/10	1.0	4501 4505
69	Reporter's Transcription of	02/16/18	19	4501–4727
	Proceedings			
72	Reporter's Transcription of	02/20/18	20	4809–5000
	Proceedings		21	5001–5039
73	Reporter's Transcription of	02/21/18	21	5040-5159
	Proceedings			
74	Reporter's Transcription of	02/22/18	21	5160 - 5250
	Proceedings		22	5251-5314
77	Reporter's Transcription of	02/23/18	22	5328-5500
	Proceedings		23	5501-5580
78	Reporter's Transcription of	02/26/18	23	5581-5750
	Proceedings		24	5751-5834
79	Reporter's Transcription of	02/27/18	24	5835-6000
	Proceedings		25	6001–6006
80	Reporter's Transcription of	02/28/18	25	6007–6194
	Proceedings			
81	Reporter's Transcription of	03/01/18	25	6195–6250
	Proceedings		26	6251-6448
82	Reporter's Transcription of	03/02/18	26	6449–6500
	Proceedings		27	6501–6623
83	Reporter's Transcription of	03/05/18	27	6624–6750
	Proceedings		28	6751–6878
86	Reporter's Transcription of	03/07/18	29	7045-7250
	Proceedings		30	7251 - 7265
88	Reporter's Transcription of	03/09/18	30	7424-7500
	Proceedings		31	7501-7728
89	Reporter's Transcription of	03/12/18	31	7729–7750
	Proceedings		32	7751-7993
99	Reporter's Transcription of	03/20/18	37	9076–9250
	Proceedings		38	9251-9297
100	Reporter's Transcription of	03/21/18	38	9298–9500
	Proceedings		39	9501–9716
101	Reporter's Transcription of	03/21/18	39	9717–9750
	Proceedings		40	9751–9799
	1 100ccumgs		40	5101 <u>—</u> 1010

102	Reporter's Transcription of	03/21/18	40	9800–9880
	Proceedings			
103	Reporter's Transcription of	03/22/18	40	9881-10000
	Proceedings		41	10001-10195
104	Reporter's Transcription of	03/23/18	41	10196–10206
	Proceedings			
24	Second Amended Complaint and	11/17/17	3	619–637
	Demand for Jury Trial			
107	Special Jury Verdict	03/23/18	41	10237–10241
112	Special Master Order Staying Post-	04/24/18	42	10372–10374
	Trial Discovery Including May 2, 2018			
	Deposition of the Custodian of Records			
	of the Board of Regents NSHE			
62	Status Check Transcript	02/09/18	14	3492–3500
			15	3501–3510
17	Stipulated Protective Order	08/24/17	1	228–236
121	Supplement to Motor Coach	05/08/18	49	12013–12018
	Industries, Inc.'s Motion for a Limited			
	New Trial			
60	Supplemental Findings of Fact,	02/05/18	14	3470–3473
	Conclusions of Law, and Order			
132	Transcript	09/25/18	50	12333–12360
23	Transcript of Proceedings	11/02/17	3	598–618
27	Volume 1: Appendix of Exhibits to	12/01/17	3	665–750
	Motion for Summary Judgment on		4	751–989
	Punitive Damages			
28	Volume 2: Appendix of Exhibits to	12/01/17	4	990–1000
	Motion for Summary Judgment on		5	1001–1225
	Punitive Damages			
29	Volume 3: Appendix of Exhibits to	12/01/17	5	1226–1250
	Motion for Summary Judgment on		6	1251–1490
	Punitive Damages			

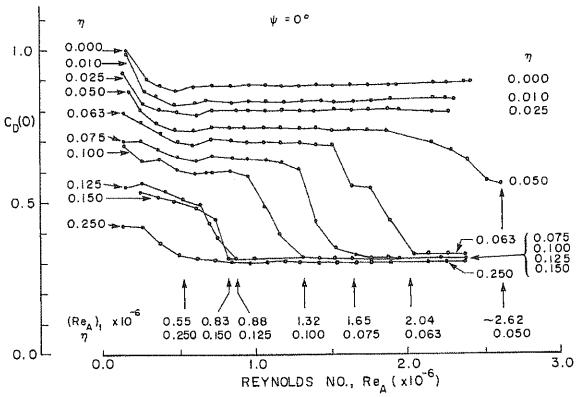


FIG. 11: VARIATION OF DRAG COEFFICIENT AT $\psi=0^\circ$ WITH REYNOLDS NUMBER (EDGE RADIUS AS PARAMETER)

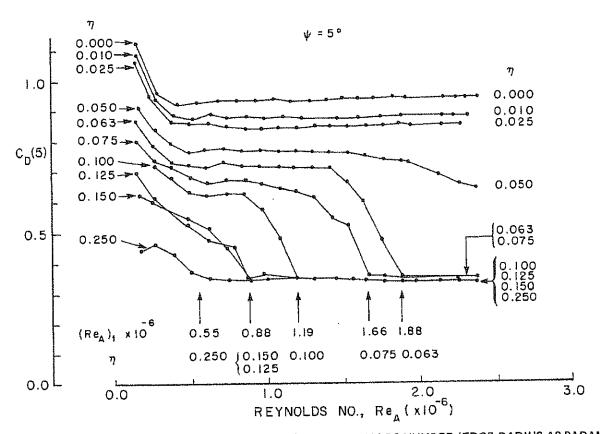


FIG. 12: VARIATION OF DRAG COEFFICIENT AT $\psi=5^\circ$ WITH REYNOLDS NUMBER (EDGE RADIUS AS PARAMETER)

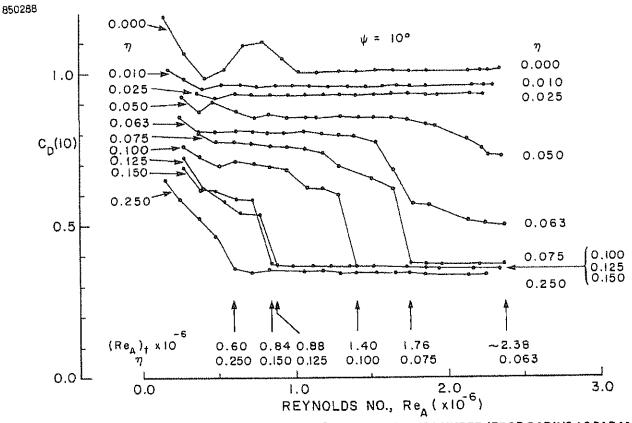


FIG. 13: VARIATION OF DRAG COEFFICIENT AT ψ = 10° WITH REYNOLDS NUMBER (EDGE RADIUS AS PARAMETER)

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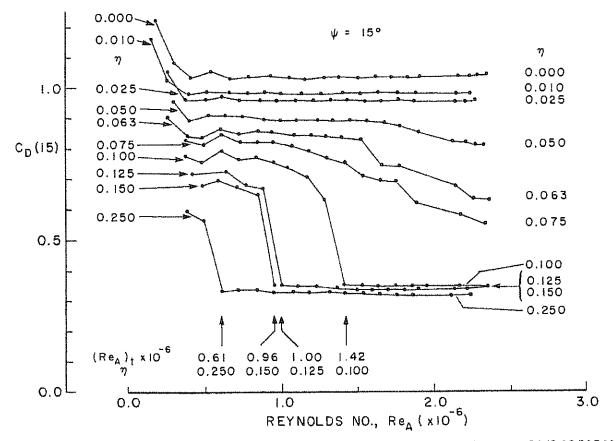
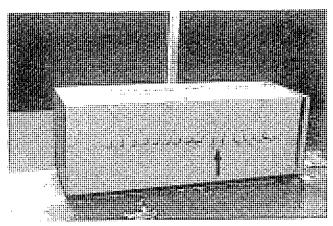
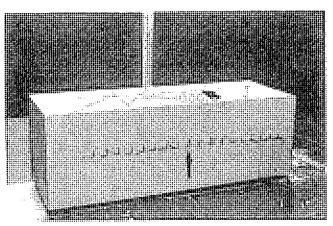


FIG. 14: VARIATION OF DRAG COEFFICIENT AT ψ = 15° WITH REYNOLDS NUMBER (EDGE RADIUS AS PARAMETER)

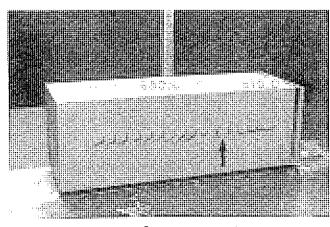
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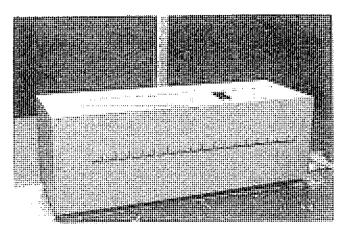
 $Re_A = 1.82 \times 10^6$, $C_D = 0.734$, $x_r/L = 0.356$



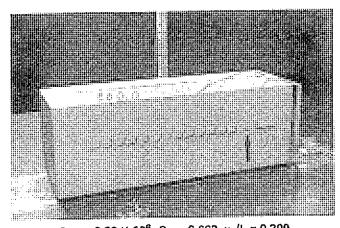
 $Re_A = 1.29 \times 10^6$, $C_D = 0.695$; Flow separated on top and side



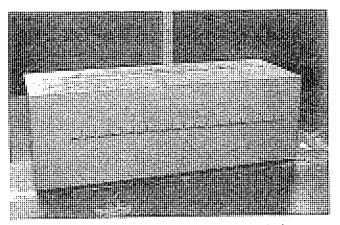
 $Re_A = 2.08 \times 10^6$, $C_D = 0.701$, $x_r/L = 0.311$



 $Re_A = 1.67 \times 10^6$, $C_D = 0.550$; Flow separated on top, attached on side



 $Re_A = 2.30 \times 10^6$, $C_D = 0.663$, $x_r/L = 0.200$



 ${\rm Re_A} = 2.04 \times 10^6$, ${\rm C_D} = 0.324$; Flow attached on top and side

FIG. 15: SURFACE FLOW AT ψ = 0° WITH η = 0.05 (REATTACHMENT POINTS INDICATED BY ARROWS)

FIG. 16: SURFACE FLOW AT ψ = 0° WITH η = 0.063 (REATTACHMENT POINTS INDICATED BY ARROWS)

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different asymptotic flow separation and flow reattachment points. Measurements on square and rectangular two-dimensional prisms [8] have also shown nearly identical drag coefficients for combinations of radius and Reynolds number that produce fully-attached leading-edge flow.

An alternate way of looking at the data is provided by cross-plotting the measurements in Figures 11 through 14 as functions of edge radius with the Reynolds number as a parameter. This type of measurement is most commonly found in the literature [1,2,3]. An example of such a crossplot is shown in Figure 17, taken from Figure 12 for $\psi = 5^{\circ}$, at six different Reynolds numbers. These curves define the optimum edge radius for a given Reynolds number, where the optimum is taken to be the smallest radius that provides fully-attached flow at that Reynolds number. It is immediately apparent that a test designed to define this optimum will give different answers at different test Reynolds numbers, except at very high values, as shown. This situation is unacceptable to the designer and is a serious problem faced, and often unrecognized, in many small-scale, low-Reynolds number tests.

Later in the paper it will be shown how these data can be collapsed, allowing an accurate extrapolation of model scale data to full scale and providing a clear indication of the optimum front-edge rounding needed to efficiently reduce the drag of box-shaped vehicles.

The graphs of Figures 11 to 14 were based on runs with test speed increasing, and when the measurements were then made with test speed decreasing different behaviour was found. Figure 18 shows this situation. The shaded regions are regions of flow hysteresis where two values of drag coefficient can occur depending on whether speed is increasing or decreasing, as indicated by the arrows on the curves. Once the flow has become attached it stays attached to a lower Reynolds number before separating once again. The hysteresis was usually small at high and low Reynolds numbers but was large at transitional values, especially for 0.05<n<0.10.

An indication of the Reynolds number behaviour of the other aerodynamic coefficients is presented in Figure 19. The data are at a yaw angle of 5° and are typical of the data at other angles. Side force, rolling moment, and lift to a lesser extent, all seem relatively independent of both Reynolds number and edge radius, while pitching moment and yawing moment are sensitive to both radius and Reynolds number.

The pitching moment reflects the drag coefficient changes since, with the origin of co-ordinates at ground level, it is primarily due to the drag vector acting roughly in the middle of the body. The yawing moment changes reflect the forward shift in the centre of pressure of the side force as the sidewall separation bubble is reduced or disappears at large values of radius or Reynolds number.

YAW BEHAVIOUR - The influence of yaw angle on Reynolds number behaviour can be seen in Figure 20, which clearly shows the increase in transcritical Reynolds number as yaw angle

increases, for an edge radius of $\eta = 0.075$. It is evident that attached flow on the body sides occurs up to 10° yaw angle but not at 15° angle with this edge radius.

Another perspective of the model's yaw behaviour, with edge radius as a parameter at fixed Reynolds number, can be found in Figure 21 and Figure 22. Figure 21 shows the drag coefficients for all edge radii at $Re_A = 2.2 \times 10^{\circ}$. These measurements are symmetrical about 0° yaw angle, for small and large radii, but are asymmetrical for values of radius that are in the transitional Reynolds number region for $Re_A = 2.2 \times 10^6$. Here, the asymmetry is due to a yaw hysteresis where double-valued drag coefficients can occur at mid-range yaw angles, depending on whether yaw angle is increasing or decreasing. A few measurements of this yaw hysteresis were made and one example is presented as the shaded region in Figure 21 for $\eta = 0.063$. It is the author's experience that the large hysteresis seen here is common for very simple or aerodynamically clean shapes but that it is usually much reduced by typical vehicle details like break lines, seams and protuberances, or by the incident wakes from other vehicle components such as the cab or exhaust wakes flowing over the truck body or the trailer front face.

The yaw behaviour of the other forces and moments is shown in Figure 22 at four selected radii. Again, the relative insensitivity of side force and rolling moment with edge radius are apparent, although some change does occur as indicated by changes in the side force and rolling moment coefficient slopes presented in the figure. These slopes, $C_{S,\,\,\psi}$ and $C_{RM,\,\,\psi},$ respectively, were obtained from linear regression through the seven data points between ±3° yaw angle. The reductions in lift and pitching moment are probably a result of reduced roof suctions and lower drag, respectively, as edge radius is increased. The change in yawing moment is also striking as the yawing moment slope near 0° yaw angle is negative for square edges and for small radii (note data for a fifth radius of $\eta = 0.025$ has been added to this graph only). This slope becomes positive for radii equal to or greater than $\eta = 0.050$, and increases with increasing radius - a result of the forward shift of the centre of pressure of side force. The negative yawing moment slopes are a result of the centre of pressure lying aft of the body centre.

FLOW TRIPPING - A brief study into the use of strips of grit or other particles to reduce the critical and transcritical Reynolds numbers was made using three of the radii employed in the main part of the test. A strip was formed by painting on a band of glue and sprinkling on the particles. The strip was placed near the top and side edges on the front face only, as seen in Figure 5.

The effects of grit size, strip width and strip location were examined. Figure 23 shows the influence of the most effective trip used — 0.9 mm spherical glass beads. The transcritical Reynolds number for $\eta=0.063$ has been reduced by a factor of nearly two, from (ReA) $_{t}=2.05\times10^{6}$ to (ReA) $_{t}=1.08\times10^{6}$.

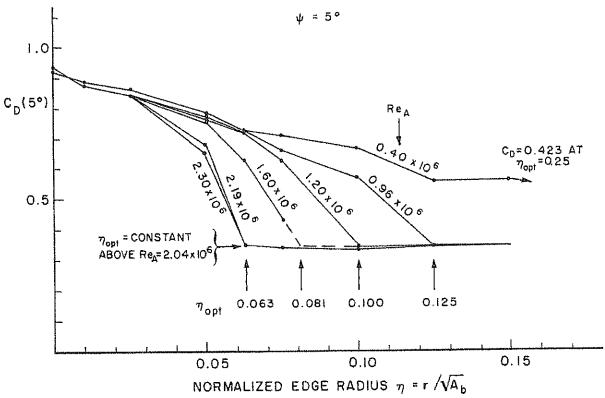


FIG. 17: VARIATION OF OPTIMUM FRONT-EDGE RADIUS WITH REYNOLDS NUMBER

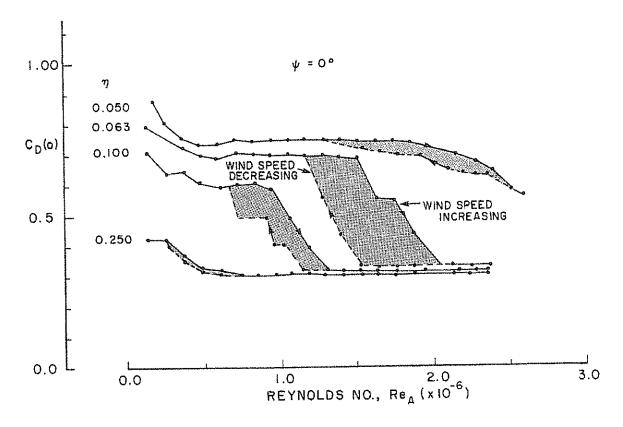


FIG. 18: EXAMPLE OF REYNOLDS-NUMBER-DEPENDENT FLOW HYSTERESIS

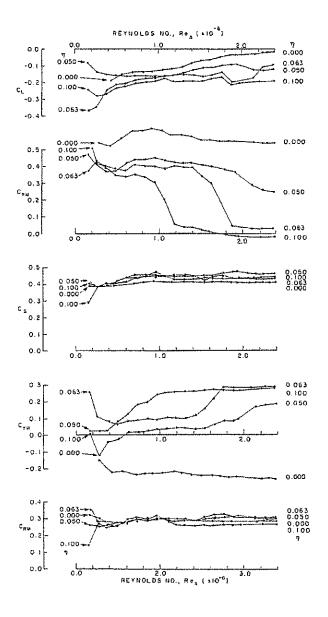


Fig. 19: EFFECT OF REYNOLDS NUMBER AND EDGE RADIUS ON LIFT, PITCHING MOMENT, SIDE FORCE, YAWING MOMENT AND ROLLING MOMENT AT $\psi=5^\circ$

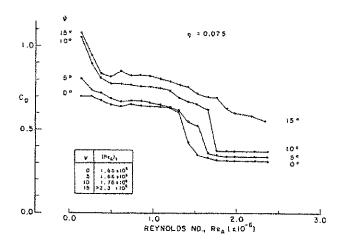


FIG. 20: VARIATION OF TRANSCRITICAL REYNOLDS NUMBER WITH YAW ANGLE FOR η = 0.075

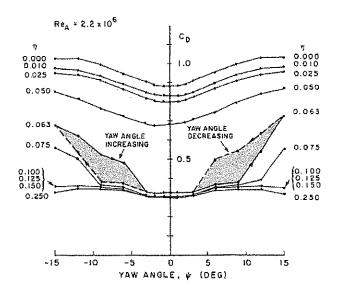


FIG. 21: VARIATION OF DRAG COEFFICIENT WITH YAW ANGLE SHOWING YAW-DEPENDENT FLOW HYSTERESIS

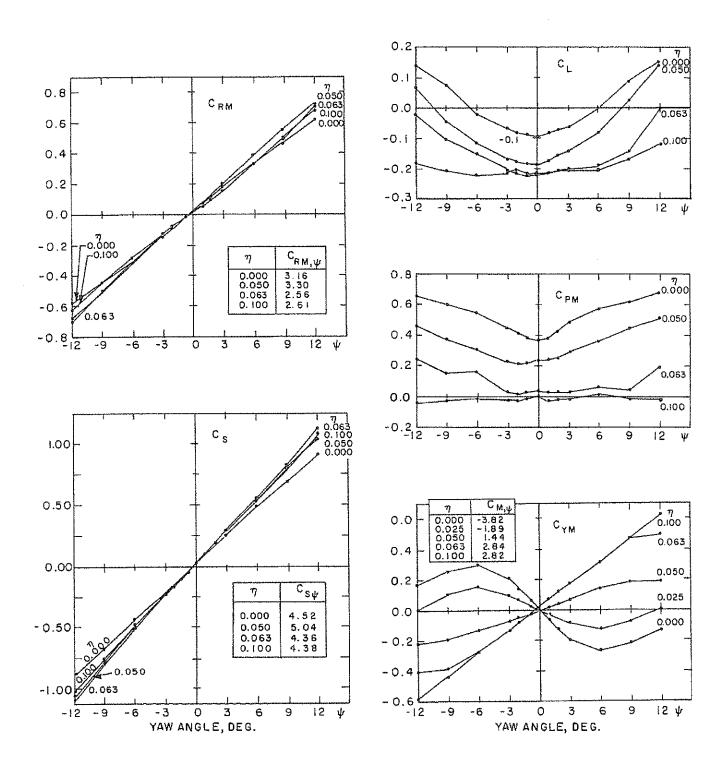


FIG. 22: VARIATION OF LIFT, PITCHING MOMENT, SIDE FORCE, YAWING MOMENT AND ROLLING MOMENT WITH YAW ANGLE

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The size of the trip particles and the strip location on the front face were important to the overall behaviour, as shown in Figure 24. The strip was located on the front face the same distance in from the side and top edges, as shown in the inset sketch. A trip strip was not used for the bottom, square edge. The width of the trip strip, over the range from 3 mm to 12 mm, was found to be of secondary importance.

Different particle sizes and locations were found to result in different reductions in transcritical Reynolds number and, unfortunately, in different asymptotic drag values at high Reynolds number. Not enough tests were performed to generalize with certainty, but indications were that a particle strip-width of one-quarter the edge radius, located at a distance equal to the radius of the edge (y/r = 1) toward the centre of the front face, and with a particle size that gave the lowest drag would be close to the best choice.

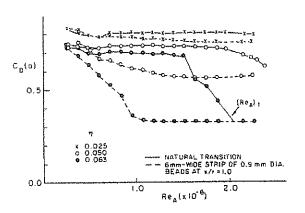


FIG. 23: EFFECT OF PARTICLE STRIPS ON REYNOLDS NUMBER DEPENDENT BEHAVIOUR OF DRAG COEFFICIENT AT $\psi=0^\circ$

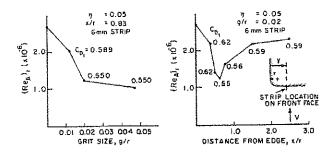


Fig. 24: EFFECTS OF PARTICLE SIZE AND STRIP LOCATION ON TRANSCRITICAL REYNOLDS NUMBER AND DRAG COEFFICIENT AT $\psi=0^\circ$

TRANSCRITICAL REYNOLDS NUMBER COLLAPSE

An interesting result was obtained when the transcritical Reynolds numbers, $(\text{Re}_{A})_{t}$, of Figure 11 to Figure 14 are plotted against non-dimensional radius, n, using a log-log scale. The locus of these data points was a straight line that completely defined the transcritical Reynolds number behaviour, as shown in the right-hand curve of Figure 25. The transcritical Reynolds number can be related to edge radius by:

$$\eta = r/\sqrt{\Lambda} = k(Re_A)_t^a$$
 (2)

Linear regression results in

$$k = 1.30 \times 10^5$$

and

a = -1

giving

$$\eta = 1.30 \times 10^5 / (Re_A)_r$$
 (3)

From this it is apparent that the transcritical Reynolds number is a constant, if based on edge-radius, where:

$$(Re_r)_t = rV_t/v = (Re_A)_t(r/\sqrt{\Lambda}) = 1.30 \times 10^5$$
 (4)

The collapse of the measured data on this functional form is shown in the left-hand curve of Figure 25. The measured values of transcritical Reynolds number are seen to increase only a small amount with yaw angle over the range tested, up to 15°, and this effect is ignored in the fit above.

A preliminary version of this collapse was presented previously by Cooper [9] using sparse data from the literature. The current study arose from the possibilities suggested by that analysis. Polhamus [8] had also suggested that the critical Reynolds number for two-dimensional rectangular prisms with rounded edges was approximately constant when edge radius was selected as the reference length for the Reynolds number calculation.

OPTIMUM EDGE RADIUS

The major application of the data presented in Figures 11 to 14 is to the determination of the optimum edge radius required for minimum drag. As before, the optimum is the value of radius that reduces the drag to the lowest level through fully-attached, leading-edge flow. The optima are found from typical cross-plots like Figure 17, for $\psi=5^{\circ}$. It is evident from this figure that the optimum radius reduces with increasing Reynolds number, up to a value of $\mathrm{Re_A}=2.04\times10^{6}$, but that the optimum radius has a constant minimum value of $\mathrm{n_{opt}}=0.063$ above this Reynolds number. Fully-attached, front-end flow does not occur at smaller radii, no matter how high the Reynolds number. The tendency of the drag coefficient to

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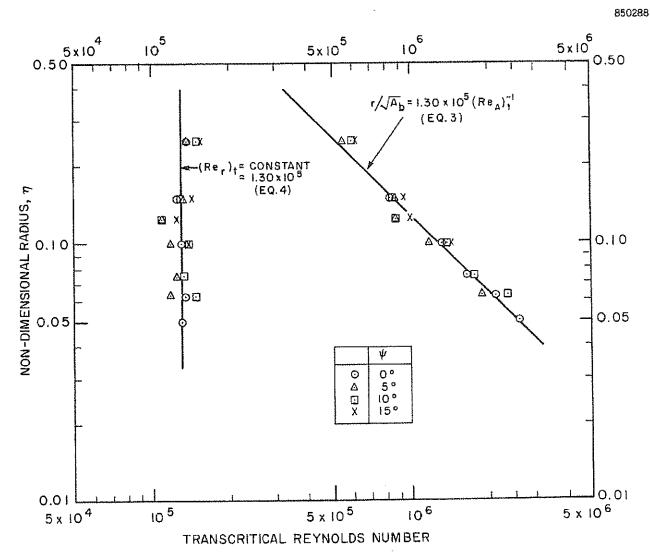


FIG. 25: COLLAPSE OF FRONT-EDGE RADIUS DATA ONTO A UNIVERSAL CURVE

plateau at a higher value for $\eta < 0.050$, compared to the much lower drag plateau for $\eta > 0.063$, as can be seen in Figure 12, indicates that this is the case.

Almost identical behaviour is found at 0° yaw angle, and similar behaviour occurs at 10° and 15° yaw angle. The only difference in the latter two cases is that the Reynolds number break points at which the minimum values of $\eta_{\rm opt}$ occur become successively lower and the value of constant radius successively larger, as yaw angle increases. All four yaw angles follow the same relationship with Reynolds number, at low Reynolds number, until the minimum allowable value for a given yaw angle is reached, at which point nopt becomes constant. Thus, a single curve with a series of yaw-angledependent branches is formed, as shown by the data points in Figure 26. At Reynolds numbers below the break points the values of optimum radii follow the same curve as in Figure 25. An examination of Figures 11 to 14 show that this must be the case.

The solid lines drawn through the points in Figure 26 are proposed as the optimum-edge-radius design boundaries required to minimize aerodynamic drag for box-like vehicles. They depend on Reynolds number and maximum yaw angle only.

The upper bound, at low Reynolds numbers, is set at nopt = 0.500 since, for radii larger than body height or width, the rounded edges would not be parallel to the roof or sides. The lower limits depend on yaw angle and are set by the minimum radii for fully-attached flow at high Reynolds number. The maximum yaw angle limits are specified in the inset graph of Figure 26 and were determined from the data of Figures 11, 12, 13, 14 and 21.

A yaw range greater than 15° is probably not necessary for two reasons. Firstly, as will be shown, higher yaw angles are uncommon at typical road speeds. Secondly, attached flow is unlikely to occur at higher yaw angles, especially on geometrically more complex, less smooth shapes typical of real vehicles.

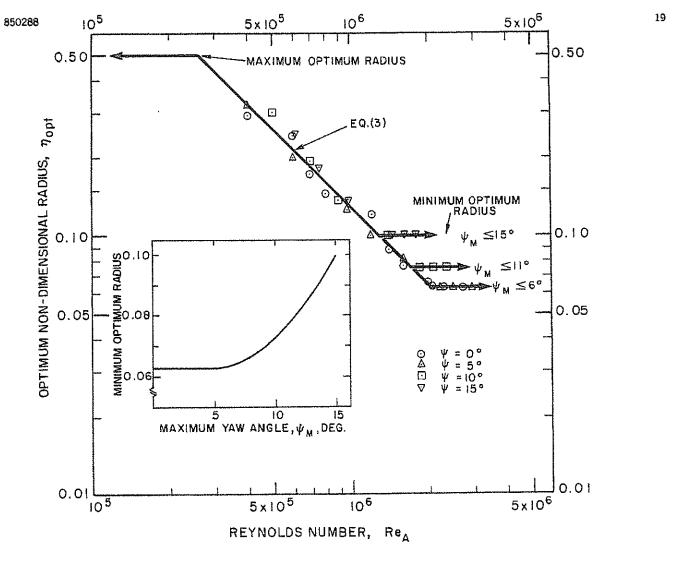


FIG. 26: OPTIMUM FRONT-EDGE RADIUS DESIGN BOUNDARIES

The lower bounds are subject to interpretation, of course, because the limiting behaviour must occur somewhere between the boundary values found in the tests. For example, at $\psi=5^\circ$, the minimum radius will be between $n_{\rm opt}=0.050$ and $n_{\rm opt}=0.063$, the next higher value tested. In each case the higher value was chosen as being conservative.

The straight line joining the constant upper and lower bounds is identical to that found in Figure 25 and given by eq. (3).

CORRELATION WITH OTHER DATA - The question still remains as to how well the measurements on a simple rectangular body apply to trucks, buses or rail vehicles, at either model or full scale. An answer is provided, in part, in Figure 27 where the optimum radii derived from other sources and on other vehicle types [1,3,8,10,12,13,14] are plotted and compared to the boundaries of Figure 26. Most of the data are at 0° yaw angle, although the truck measurements are based on wind-averaged drag coefficient, which include yaw angles up to 7°. The open symbols, in particular,

are from measurements on detailed models of real vehicles and, in one instance [3], on full scale vans. In general, the optimum edge-radius-Reynolds-number boundaries of Figure 26 appear to correlate well with most other available measurements. It would be expected that surface discontinuities, roughness, and upstream disturbances could reduce the optimum radii compared to the smooth body used in the current tests, as is generally seen.

An additional correlation is provided in the data of Figure 28, which also demonstrates the differences in drag reduction possible between the simple, rectangular body and more complex vehicle shapes. The comparison contains front—edge-rounding data for the current rectangular body, for two tractor-trailers [10] and two straight trucks [14] at 1:10 scale, and for a full-scale Ford straight truck [15] in the 9m × 9 m wind tunnel of the National Research Council of Canada. The graph shows some interesting trends. As mentioned previously, the drag-reducing potential of edge rounding is much greater for a

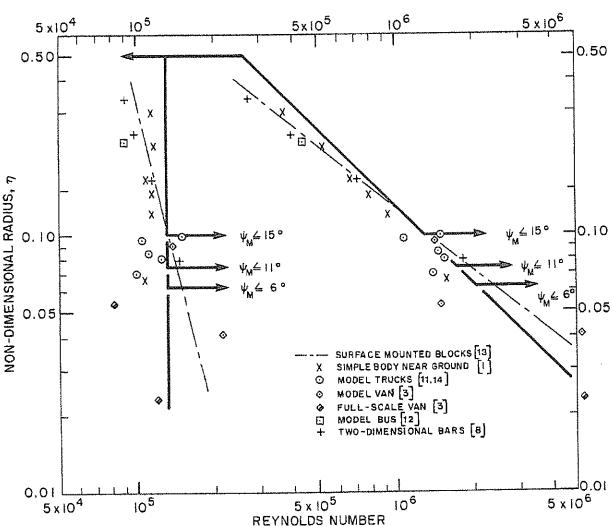


FIG. 27: COMPARISON OF FRONT-EDGE RADIUS DESIGN BOUNDARIES WITH OTHER MEASUREMENTS

simple body like a bus or van than it is for more complex vehicles like truck bodies or trailers. In the former case, the edge rounding must cause a significant change in the pressure distribution over the whole front face when the radius reaches the optimum value. Fully-attached edge flow occurs and the consequent large drag drop to nearly constant values at greater radii is found. In the latter case, the cab wake flow shelters a majority of the truck body or trailer and so the pressure changes are more localized near the front edges, and the drag reduction is less. At lower values of edge radius the rectangular body and the road vehicles tend to behave similarly.

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The optimum radii for all the configurations shown have nearly the same value as that for the rectangular body, as indicated, and it is this correlation - the break point in the drag curves being at the same radius - that is of most significance.

Using smoke, Ford's engineers observed that even at $\eta=0.104$ some flow separation remained on the roof of the body; a finding that differs with the rectangular body results and that could be due to the short body length used by Ford, only 1.5

times the body width. Nevertheless, the current test results would predict a required edge radius that would be close to the value giving lowest drag on the full-scale truck. Finally, the fractional drag reductions for the model and full-scale straight trucks are nearly identical - an encouraging finding for the wind-tunnel aerodynamicist.

REQUIRED MODEL REYNOLDS NUMBERS

The data from the first test can also be used to help guide the selection of the model Reynolds number required to give wind tunnel data that will correlate with full-scale. The SAE Standard Practice, J1252 [7], recommends $\rm Re_A=0.7\times10^5$. Test results from Cooper et al [16] made in support of this Practice found that 1.0×10^5 or even higher was a better choice and found that small Reynolds number effects could still be seen at $\rm Re_A=1.6\times10^5$. Examination of Figures 11 to 14 and Figure 17 suggest that the required Reynolds number should be increased to about 2.0 \times 10 5 , roughly in line with the findings of [16].

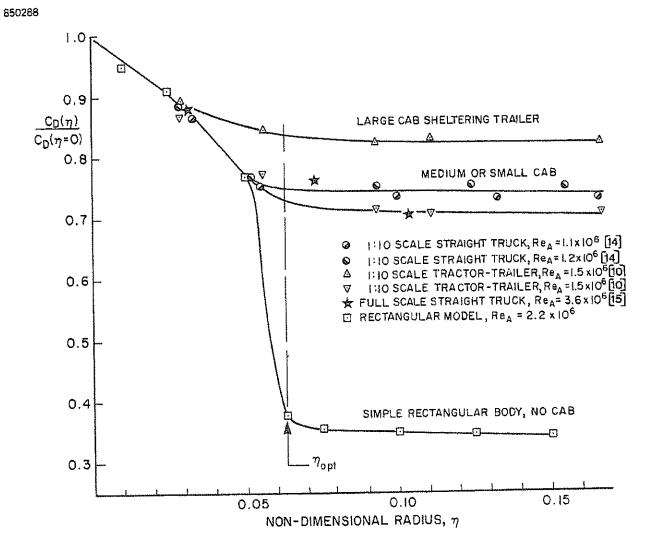


FIG. 28: COMPARISON OF FRACTIONAL DRAG REDUCTION AND OPTIMUM EDGE RADIUS FOR MODEL AND FULL SCALE TRUCKS WITH DATA FOR A RECTANGULAR BODY

APPLICATION OF EDGE-RADIUS BOUNDARIES

The application of the boundaries in Figure 26 is straightforward, although various assumptions are implicit in the use of the data. These assumptions are:

- The design boundaries developed for a rectangular body and shown in Figure 26 can be applied to more complex, box-like vehicles. This is supported by the measurements presented in Figure 27.
- ii) The effect of body height-to-width ratio is small for the differences between the model value used in this program, h/w = 1.0, and the values common to real commercial vehicles where h/w > 1.0, usually.
- iii) The square-root of body frontal area, $\sqrt{A_b}$, is an adequate reference length with which to non-dimensionalize edge radius. Obviously, for high or wide bodies this will fail and width or height, respectively, would be a better choice.

Accepting these points, it is only necessary to determine the operating Reynolds number and the maximum yaw angle of concern.

The selection of operating Reynolds number can be based on a vehicle speed for which aerodynamic influences become important and one obvious choice, then, is the speed at which aerodynamic and rolling resistances are equal. This speed will be below the vehicle's cruising speed and so would be conservative. Assuming a crude model for the rolling resistance of 0.01 N resistance for each Newton of weight, the design spaed would be:

$$v_o = \{[0.02/(\rho \overline{C}_D)](W/A)\}^{\frac{1}{2}} m/s$$
 (5)

Strictly speaking, since \bar{C}_D is a function of V_o , an iterative solution is required to solve correctly for V_o , but a first approximation using \bar{C}_D at 90 km/h is sufficient for design purposes. Finally, some rationale must be established for choosing the maximum yaw angle for which

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attached flow is required. As seen in Figure 26, the price for good aerodynamic performance at large yaw angles is increased edge radius. The maximum probable yaw angle is a function of vehicle speed and local wind statistics. It would be impractical to include information from specific locales, so annual hourly mean wind statistics typical of the North American average and the method of Cooper [10] will be used to assess the probability of exceeding a given yaw angle (the cumulative probability of yaw angle) for various road speeds from 50 km/h to 130 km/h.

The probabilities are given in Figure 29 and it is apparent that the yaw angle associated with a given probability level increases with decreasing road speed. For example, 6° has a 0.1 chance of being exceeded at 130 km/h road speed, but at 50 km/h 16° is exceeded with the same probability. That is, the more rapidly a vehicle travels, the lower the incident yaw angles produced by natural winds. Assuming that a resonable probability level for design is 0.10, then the maximum yaw angle range of concern can be obtained as a function of road speed, as indicated in the graph.

As an example, one can choose two design cases, one for a straight truck and the other for a tractor-trailer, using the vehicle configurations employed in the tests reported in the following section of this paper. The vehicle's

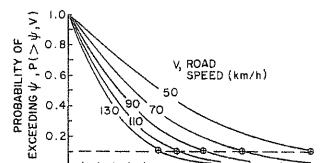


FIG. 29: PROBABILITY OF A VEHICLE EXCEEDING A GIVEN YAW ANGLE AT VARIOUS ROAD SPEEDS

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YAW ANGLE, ψ

10

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properties and design operating speeds (from eq. (5)) are given in Table 6.

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The values of radius obtained for these configurations, at the operating Reynolds number obtained using eq. (5), are less than the minimum allowable value of $\eta_{\rm opt}$. Thus the inset graph of Figure 26 must be used to select the radii - 250 mm for the straight truck body and 200 mm for the trailer. The 200 mm value is close to the value of 250 mm commonly found on trailers.

TABLE 6 DATA FOR DESIGN EXAMPLES

	Straight Truck Body	Tractor-Trailer
Vehicle area, A	8,39 m ²	9.85 m ²
Body area, A _b	6.25 m ²	7.06 m ²
$\sqrt{A_b}$	2,50 m	2,66 m
w	88200 N	264600 N
Ĉ _D	0.775	0.968
V_{o}	54 km/h	70 km/h
Initial radius [Eqn. (4)] , r $r/\sqrt{A_b}$	126 mm 0,050	97 mm 0.036
Design yaw angle	15°	11.4°
Final radius	$r/\sqrt{A_b} = 0.100$	$r/\sqrt{A_b} = 0.075$ r = 200 mm
(Inset graph from Fig. 26)	r = 250 mm	r = 200 mm

LEVELS OF FRONT-EDGE DRAG REDUCTION

The levels of drag reduction indicated by Figures 11 to 14 are generally not realizeable on most trucks, although they should be available for the less complex shapes used for buses, vans and rail vehiclas. The differences in drag levels between those for the trucks and those for the rectangular body shown in Figure 28 must be due to interference effects between the cabs and the truck bodies or trailers. The surface pressures on the straight truck body behind and above the cab will be determined, in large part, by the cab flow-field and will reduce the area over which edge-related pressure changes can act. Some similar behaviour must occur with the tractortrailer. Thus, one would expect that the lowest drags would be found for the least cab interference, and this is the case in Figure 28. The least drag reduction occurs with a large cab sheltering the trailer, the straight trucks are in the middle, and a small cab with very exposed, large trailer has the greatest drag reducing potential. Comparing these three curves with that for the rectangular body clearly indicates that the future for low drag commercial vehicles requires improved integration of cab and body.

Additional indications of available levels of drag reduction are provided by the two trucks employed in the final section of this paper. They were tested with rounded forebodies as well as with the standard versions, and a reduction in wind-averaged drag coefficient of 0.160 was measured for the straight truck while a reduction of 0.069 was measured for the tractor-trailer. By comparison, a cab-mounted deflector provided a wind-averaged drag coefficient reduction of 0.078 for the straight truck and 0.079 for the tractor-trailer.

DISCUSSION OF EFFECTS OF REAR-EDGE SHAPING

BASE DRAG LEVELS - As a prelude to the discussion of base drag reduction, a brief commentary on the magnitude and nature of base drag is in order. Generally speaking, base drag results from the pressure reduction over the rear face of a vehicle due to the entrainment of fluid from the base region by the shear layers separating from the rear edges. It has been suggested [2] that vehicles with reduced drag resulting from a good fore-body shape may have increased base drag because of the higher entrainment due to the thinner separating shear layers, although this simple concept may be upset by changes in underbody flows when a body is in ground proximity.

Typical measurements of base drag against yaw angle by Marks et al [5] and Cooper [11] are shown in Figure 30. Marks' measurements were obtained from integrated base pressures on truck models while those of Cooper were from direct force measurements on the base of a bus. The base drag coefficients are similar, even though the total bus drag levels are only one-half of those of the trucks. This is not surprising when one considers that both have parallel-sided rear ends, cut-off

perpendicular to the vehicle's lengths. The bus drag levels were referred to true frontal area while those of the trucks were referred to height times width. The coefficient errors introduced by the different reference areas should be small since height times width is usually only a few percent larger than true frontal area for a truck.

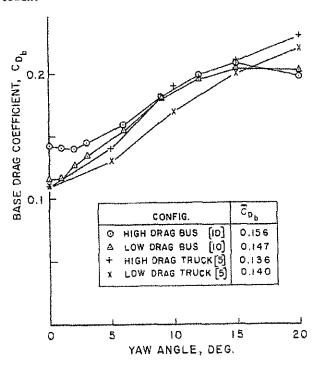


FIG. 30: BASE DRAG COEFFICIENTS OF TYPICAL TRUCKS AND BUSES

YAW BEHAVIOUR — The primary measurements were made over a range of yaw angles, rather than Reynolds numbers, at a fixed test speed of 73 m/sec. The resulting Reynolds numbers were 1.5×10^6 for the Ford truck and 1.6×10^6 for the Astro 95 tractor-trailer. Typical yaw results can be seen for the Ford truck with standard body front—end and bevelled or curved rear panels (sides and top only, Figure 9) in Figure 31 and Figure 32, respectively. The upper graph in each figure shows the drag coefficient while the lower graph shows the change, or increment, in drag coefficient defined as:

$$\Delta C_D = C_{D_{base}} - C_{D_{modified}}$$
 (6)

Solid lines are used to highlight the data for the standard configurations and for the panel angles giving the lowest drag. Both the bevel and the radius produce similar results — an increasing drag reduction with increasing panel angle, to a maximum at the optimum angle, followed by a decrease in drag reduction beyond this angle. The drag reduction was fairly constant with yaw angle, showing a tendency to increase with yaw angle at the better (lower drag) panel angles. Qualitatively, similar results were found for the

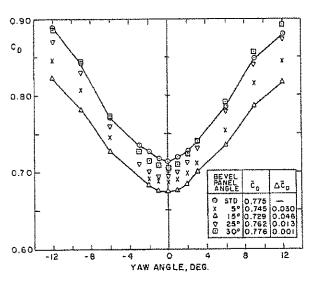
tractor-trailer configurations, but the levels of drag reduction were always about 70 percent of those found for the straight truck. These smaller drag reductions could be a result of the thicker boundary layers on the longer trailers and, perhaps, could be due to differences in the trailer's underbody flow.

The wind-averaged drag coefficients and drag coefficient increments are included in the keys to the figures and provide a better appreciation of the average drag changes. They provide a more convenient summary of the data than detailed plots like Figures 31 and 32 and permit a clear, accurate assessment of the yaw measurements.

The wind-averaged drag increment, $\Delta \bar{C}_D$, of all eight vehicle configurations (two trucks, two front faces, two types of rear-edge modification) investigated are shown against panel angle in Figure 33. The optimum panel angle is readily identified in each instance as are the significant differences in off-optimum performance of the curved and bevelled panels. It is also apparent that performance reduces less rapidly for the

bevels at angles below optimum than above. The opposite is true with the radii. The bevelled panels produced the larger base drag reductions, at the optimum angles. The drag reductions for either truck and either type of rear panel were greater when the rounded front faces were fitted to the truck body or trailer. The lower drag reductions previously noted for the tractor-trailers can be seen. Also, it is evident that zero angle, parallel extensions of the body roof and side walls lead to a drag increase for both trucks.

The optimum panel angle was always 10° or 15° , depending on configuration and panel length. The measurements discussed, so far, were at a panel length of 457 mm, full-scale, giving $\overline{2}=0.183$ for the straight truck and $\overline{2}=0.172$ for the trailer. For convenience, the lengths of the rear panels will be discussed in terms of their equivalent full-scale values, which were the same for both trucks. However, the graphs and any applications of the data will be based on the non-dimensional panel length, $\overline{2}$.



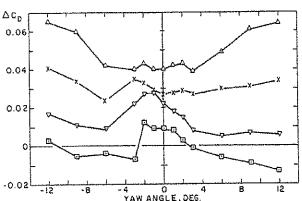
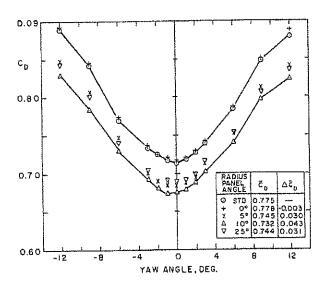


FIG. 31: EFFECT OF REAR BEVEL FITTED TO SIDES AND TOP OF FORD LN700 STRAIGHT TRUCK BODY. STANDARD FRONT FACE ON BODY, \(\bar{\bar{\chi}} = 0.183



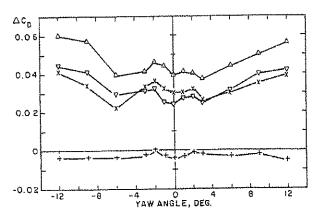
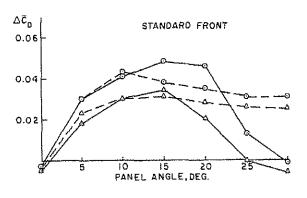


FIG. 32: EFFECT OF REAR RADIUS FITTED TO SIDES AND TOP OF FORD LN700 STRAIGHT TRUCK BODY. STANDARD FRONT FACE ON BODY, $\bar{x}=0.183$

25

Assuming that the base drags of the test trucks were identical to the average of the trucks used as examples in Figure 30, then the bevelled rear panels reduce the base drag, with standard front faces, by 35 percent for the straight truck and by 25 percent for the tractor-trailer. These percentages are referenced to the average wind-averaged base drag coefficient for both trucks in Figure 30, $\Delta C_{\rm D}$ = 0.138.

The effect of rear panel length is presented in Figure 34. Each measurement was made at the optimum angle, as determined from a set of measurements like those of Figure 33. The optimum panel angle was 15°, unless a given data point is labelled otherwise. Initially, the drag reduction is seen to increase with panel length, whether bevel or radius, and then it levels off. While no optimum length can be found, it is evident that a non-dimensional panel length of 0.18 (full scale panel length of 457 mm) need not be exceeded. Further, even a small panel length of only one-third this value, 152 mm, still provides one-half the drag reduction of the longer panel. The straight truck and the tractor-trailer show the same functional behaviour with panel length. The latter, as noted previously, had the smaller drag increments.



© STRAIGHT TRUCK $\bar{\ell} = 0.183$ A TRACTOR-TRAILER $\bar{\ell} = 0.172$ REAR BEVEL

REAR RADIUS

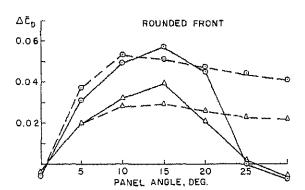
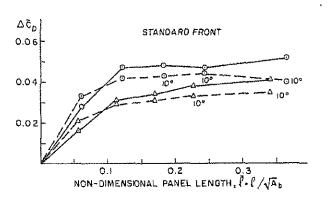


FIG. 33: EFFECT OF REAR PANEL ANGLE ON BASE DRAG REDUCTION

A series of tests were performed with the open, lower side of the cavity closed by a straight panel parallel to the ground. The tests were done for all bevelled and curved panel lengths but at the optimum angle only. Figure 35 shows that this closure further increases the drag reduction. A bevelled panel length of 457 mm now provides a 42 percent base drag reduction for the truck and a 28 percent reduction for the tractor—trailer, with standard front faces. The results are only presented for the rear bevels, but the same fractional gain was also available with the radius.

A final comparison of the optimum behaviour of both types of rear-edge modifications, as a function of panel length, is made in Figure 36. On average, the bevel provides slightly greater drag reduction except at short lengths. Considering possible experimental error, the two have nearly identical performance.

A comparison of the importance of shaping individual rear edges was made using a bevelled-panel length of 457 mm at 15°. These results are presented in Table 7, which also includes a measurement with the base cavity filled to determine whether the shaping or the shaping-plus-cavity were most important. An attempt was



O STRAIGHT TRUCK

A TRACTOR TRAILER

REAR BEVEL } 0=15° UNLESS

REAR RADIUS | OTHERWISE NOTED

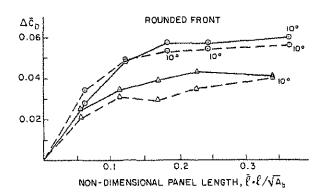


FIG. 34: EFFECT OF REAR PANEL LENGTH ON BASE DRAG REDUCTION (SIDES AND TOP ONLY, OPTIMUM ANGLE)

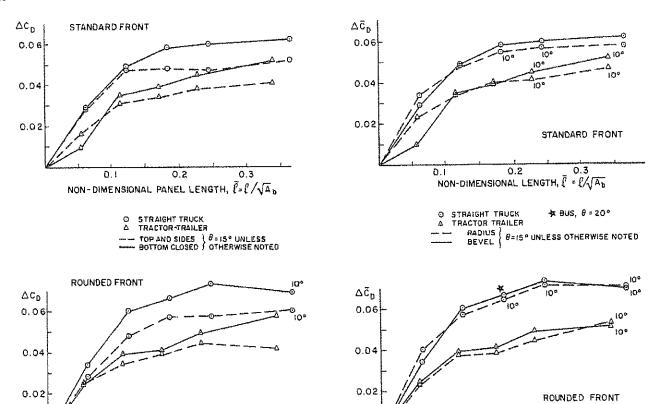


FIG. 35: EFFECT OF CLOSING THE LOWER SIDE OF THE BASE CAVITY FORMED BY BEVELLED REAR PANELS (OPTIMUM ANGLE)

0.1

0.2

NON-DIMENSIONAL PANEL LENGTH, E & /VAL

0.3

FIG. 36: COMPARISON OF REAR BEVEL AND REAR RADIUS WITH BOTTOM CLOSED (OPTIMUM PANEL ANGLE)

0.1 0.2 0.3 NON-DIMENSIDNAL LENGTH, $\bar{\ell} = \ell/\sqrt{A_b}$

TABLE 7

EFFECT OF VARIATIONS TO 30 mm, 15° BEVELLED PANEL GEOMETRY

FOR FORD TRUCK WITH ROUNDED FRONT FACE

Configuration	Č _□	ΔČD	Fraction of Reduction Produced by Simultaneously Modifying the Top, Sides, Bottom
Standard	0.615	-	eno-
Top bevel only	0.612	0.023	5
Side bevels only	0,592	0.023	39
Top and side bevels	0.568	0.047	80
Top and side bevels, bottom closed	0.556	0.059	100
Top and side bevels, cavity filled	0,561	0.054	92
5% slots	0.573	0.042	71
10% slots	0,574	0,041	70

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made to determine whether bevelled panels perforated with slots (see Figure 10) would be superior to solid panels. Two different slot porosities (percent area removed) were tried ~ one with 5 percent porosity and the other with twice this value.

Bevelled panels attached to the top alone or the sides alone produced a drag reduction far less than that found for top and sides together, with the side panels being the better of the two possiblities. The sum of the drag reductions for each modification performed individually was only about one-half that when they were used in combination. Filling the cavity produced only a very small decrease in drag reduction, so the major effect appears to be due to the new shape introduced by the panel rather than due to the shape plus base cavity. The use of perforated panels, at the levels of porosity employed, produced a smaller drag reduction than with solid panels.

The streamlined tail (Figure 10) produced drag reductions that were no larger than those resulting from the much smaller rear panels. The drag reduction for the straight truck was $\Delta \bar{C}_D = 0.071$ with just the first two elements of the tail installed and only increased to 0.074 with all six elements.

A few Reynolds number runs were performed with several of the optimum configurations, up to a maximum of about $\text{Re}_{A}=2\times10^{5}$. No influence of Reynolds number up to this value was found, except for leading-edge radius effects with the rounded front faces.

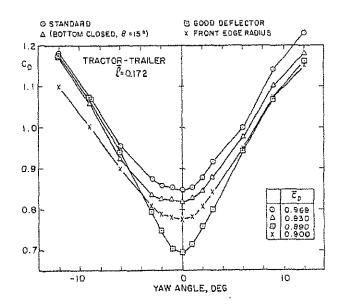
A comparison of some of the major methods of truck drag reduction is made in the graphs of Figure 37. The corresponding wind-averaged drag coefficients are summarized in Table 8. While the rear-edge modifications do not give the largest drag reductions, they provide a useful improvement and should be simple to implement.

The side force and yawing moment coefficients for the same four configurations of truck and tractor-trailer are shown in Figure 38 and Figure 39, respectively. Only these aerodynamic components are shown because of their influence on cross-wind response. Rolling moment, in all cases, reflects the changes exhibited by side force.

Side force is reduced with the rear panels and, surprisingly, yawing moment becomes more postive indicating a forward shift of the centre of pressure of side force. The center of pressure location at small yaw angles can be obtained from:

$$x_o / \sqrt{A_b} = C_{YM, \psi} / C_{S, \psi} \tag{7}$$

where the aerodynamic coefficient slopes, $C_{YM,\,\psi}$ and $C_{S,\,\psi}$, are given in the inset tables of Figures 38 and 39. The yaw angle range over which the linear least squares fit was applied to obtain the slopes is given in parentheses in these figures. The centre of pressure shift was found



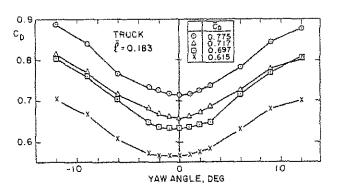
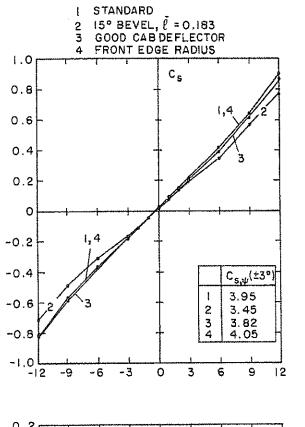


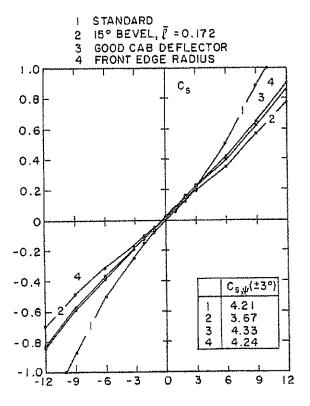
FIG. 37: COMPARISON OF METHODS OF DRAG REDUCTION ON BOTH TRUCKS

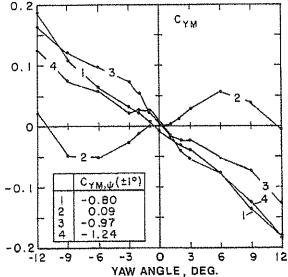
TABLE 8

COMPARISON OF DRAG-REDUCTION TECHNIQUES

	GMC T	ractor	Ford Truck		
Configuration	č _D	∆ČD	ČD	ΔĈD	
Standard	0.969		0.775	~	
Rear bevels (457 mm, 15°)	0.930	0.039	0.717	0.058	
Front face radius	0.900	0.069	0.615	0.160	
Deflector	0.890	0.079	0.697	0.078	







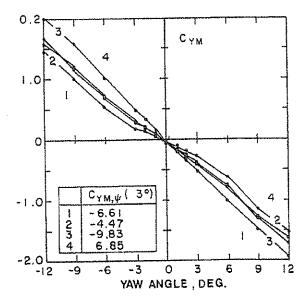


FIG. 38: COMPARISON OF SIDE FORCE AND YAWING MOMENT COEFFICIENTS WITH METHOD OF DRAG REDUCTION (STRAIGHT TRUCK)

FIG. 39: COMPARISON OF SIDE FORCE AND YAWING MOMENT WITH METHOD OF DRAG REDUCTION (TRACTOR-TRAILER)

to be 573 mm forward for the truck and 936 mm forward for the tractor-trailer. The forward shift on the straight truck is statically destabilizing in cross winds, although this effect is minimized by the side force reduction. No similar comment can be made regarding the changes to the tractor-trailer as separate force and moment measurements on both cab and trailer would have been necessary.

Bevels on the rear side and roof edges were used on the low-drag bus referred to in Figure 30. A wind-averaged base drag coefficient reduction of 0.070, or 48 percent, was measured for the bus with a 500 mm long ($\bar{\chi}=0.177$), 20° bevel. This agrees reasonably well with the rounded-front, straight-truck data of Figure 36 and suggests that the straight-truck data might be sufficiently general to apply to other vehicles.

CORRELATION WITH FULL-SCALE — At the same time that Ford performed the front—edge rounding studies they also tested one radius on the rear top and side edges, with the same radius fitted to the front edges. The radius used was 254 mm, giving $\eta=0.108$ for the front edges. The rear radius was a quarter—round set into the rear side and top edges, giving $\bar{k}=0.147$ and $\theta=45^\circ$. The drag reduction provided by the rounded rear edges was:

$$\Delta C_{\rm D}(\psi=0^{\circ}) = 0.043$$

This compares reasonably well with the value found in the current tests for $\vec{k}=0.122$ and $\theta=30^\circ$ (the largest angle tested) of:

$$\Delta C_D(\psi=0^\circ) \approx 0.040$$

The differences in panel angle should not invalidate this comparison because the drag increments are nearly constant with curved rear panels for panel angles greater than 20°. These data, then, indicate that the levels of drag reduction found in the model-scale tests should be expected at full-scale.

CONCLUDING REMARKS

Methods for the aerodynamic design of the front and rear edges of box-like vehicles, such as truck bodies, vans, buses or rail vehicles, have been presented. The techniques discussed are based on wind tunnel tests and employ simple rounding of the front edges and bevelling or rounding of the rear edges. Comparisons of the model-scale measurements with limited full-scale measurements on a straight truck in a large wind tunnel show an encouraging level of agreement. These methods are capable of lowering the aerodynamic drag as much or more than many other techniques and result in little loss of vehicle volume.

FRONT EDGE DESIGN - A design method has been developed to determine the edge radius required to minimize aerodynamic drag according to vehicle size, operating Reynolds number and maximum expected yaw angle. A universal collapse of the edge-radius-Reynolds-number behaviour in

Figure 26 can be used for this purpose. The size and operating speeds of contemporary road vehicles will usually place the edge radius at a value below the threshold optimum non-dimensional value of n = 0.063 and so the inset graph in Figure 26 will most commonly be used. Correlation of detailed-model and full-scale observations of front-edge-rounding behaviour suggest that Figure 26 may be conservative in that it predicts the need for somewhat larger edge radii than appear necessary. This could be caused by flowtripping effects due to the impingement of flow from other components ahead of the main body. With this in mind, a non-dimensional edge radius of $\eta = 0.063$ may be adequate for all purposes. Two examples were presented that showed windaveraged drag coefficient reductions of about 0.08 for a tractor-trailer and 0.16 for a straight truck.

The data were developed on a simplified body at one height-to-width ratio and at one height-to-length ratio, and so should be employed with caution until more supporting data become available, possibly through testing a full scale straight truck in the 9 m × 9 m wind tunnel of the National Research Council of Canada. However, the information presented offers the most complete investigation of front-edge rounding on surface vehicles published to date.

Studies of simple rounding are only the beginning of the development of leading edge shaping. It is possible that other shapes, elliptical edges for example, can produce similar savings with even less intrusion into the body, and this suggests a worthwhile future study. In addition the investigation of boundary layer energizers, like the vortex generators often used on aircraft wings and tails, might permit attached flow at radii smaller than the optima reported in this paper.

The front-edge rounding data also suggest that the minimum test Reynolds number needed is of the order of Re $_{\rm A}$ = 2.0 × 10 $^{\rm o}$, considerably higher than the current SAE Recommended Practice requires.

The uses of computational methods would be a powerful adjunct to additional experimentation. In this vein, the measurements presented in this paper should provide a useful test case for some of the computational codes now being developed.

REAR-EDGE DESIGN - The reduction of base drag through the simple expedient of rounding or bevelling the rear of a straight truck body or trailer was demonstrated. It was found that the bevelling was slightly superior in performance to the radius, as shown in Figure 36. The bevel could be produced equally well by a chamfer on the sides and the top of the body or by angled extension panels on the sides and roof, with a marching horizontal panel at the bottom to close the cavity so formed. These panels could either be fixed, or could be arranged to fold with the doors. It was discovered that the best panel angle was 10° to 15° from parallel to the roof or sides of the vehicle, depending on vehicle configuration, panel type, and panel length. Panel lengths greater than 0.18 times the

square-root of the base area offered little additional drag reduction. Panels only one-third this length, 0.06 times the square-root of the base area still produced about one-half the drag reduction of the longer panels. The longer panels produced a wind-averaged drag-coefficient reduction of 0.058 for a straight truck and 0.039 for a tractor-trailer. The long panel would be about 450 mm in length on a typical straight truck and, at an angle of 15°, would only intrude into the body sides and roof by 116 mm. The short panel of 150 mm would only intrude 39 mm. The curved panels would intrude less in each case.

This concept has already been applied successfully on a truck body and a bus. Its simplicity and effectiveness recommend it even at shallower than optimum angles and at reduced length, where body intrusion is negligible.

NOTATION

- A total frontal area at zero degrees yaw angle; reference area used to nondimensionalize aerodynamic forces and moments; m²
- Ab cargo carrying body reference area; used to non-dimensionalize front-edge radii and rear panel lengths; values at front and rear of body assumed equal; same as total frontal area for rectangular body; m
- C_D body-axis drag coefficient; D/q_cA
- $c_{\mathrm{D_b}}$ base drag coefficient; drag coefficient resulting from base pressures
- $\begin{array}{ccc} \textbf{C}_{D} & & \text{measured wind-axis drag coefficient} \\ \textbf{u} & & \text{uncorrected for blockage} \end{array}$
- \overline{C}_{D} wind-averaged drag coefficient; a function of road speed and assumed wind conditions that attempts to account for the occurrence of varying yaw angles and wind speeds on the road.
- ΔC_D increment in drag coefficient; the drag coefficient difference between a baseline (standard or rounded front) and a modified configuration; positive for drag reduction; C_D C_D modified
- $\Delta \overline{C}_{\mathrm{D}}$ increment in wind-averaged drag coefficient; $\overline{C}_{\mathrm{D}}$ base $\overline{C}_{\mathrm{D}}$ modified
- C_L body-axis lift coefficient; L/q_cA
- c_{PM} body-axis pitching moment coefficient; PM/q_nAw
- GRM body-axis rolling moment coefficient; RM/q_Aw
- c_S body axis side force coefficient; c_S/q_cA

- c_{YM} body-axis yawing moment coefficient; $YM/q_{_{\mathbf{C}}AW}$
- $\begin{array}{ccc} c_{S}, \psi & \text{ side force coefficient curve slope;} \\ dc_{S}/d\,\psi; & \text{deg}^{-1} \end{array}$
- $^{C}_{RM,\,\psi}$ rolling moment coefficient curve slope; $^{dC}_{YM}/d\psi;$ deg $^{-1}$
- C_{YM}, ψ yawing moment coefficient curve slope; $dC_{YM}/d\psi$, deg^{-1}
- D aerodynamic drag force; N (Figure 4)
- d body diameter; mm
- g diameter of roughness or grit particle;
- h overall height of vehicle above ground;
- L overall length of vehicle; mm lift force; N
- l rear-edge panel length; mm (Figure 9)
- \bar{l} non-dimensional rear panel length; l/\bar{l}_b
- $P(>\psi,V)$ the probability of exceeding a given yaw angle, ψ , at a road speed of V km/h
- PM aerodynamic pitching moment; Nm
- q measured test section dynamic pressure; $\frac{1}{2}\rho V^2$
- qc test-section dynamic pressure corrected
 for blockage (eq. (1))
- r front-edge radius; mm (Figure 3)
- Re A Reynolds number referenced to $\sqrt{A_b}$; $\sqrt{A_b}/v$
- $(\text{Re}_A)_t$ transcritical value of Reynolds number referenced to $\sqrt{A_b}$
- Red Reynolds number referenced to diameter; Vd/v
- Re Reynolds number referenced to radius; Vr/v
- $(\text{Re}_{_{\mathbf{T}}})_{_{\mathbf{t}}}$ transcritical Reynolds number referenced to radius
- RM aerodynamic rolling moment; Nm
- S aerodynamic side force; N
- V wind speed; m/s
- Vo design road speed for leading-edge radius estimation; m/s (eq. (5))
- W weight of vehicle; N

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- w vehicle maximum width; mm (m when used to define aerodynamic coefficients)
- x_{cg} distance of moment reference centre for body-axis co-ordinates downstream of vehicle leading-edge; mm (Table 2)
- x_o location of centre of pressure of side force relative to co-ordinate origin, positive forward; m
- $\mathbf{x_r}$ distance from leading-edge to flow reattachment point; $\mathbf{n}\mathbf{m}$
- y distance on front face of roughness strip centre-line from body edge; mm (Figure 24)
- YM aerodynamic yawing moment; Nm
- angle of rear panel (chord for circular arc); deg (Figure 9)
- whinematic viscosity of air; 1.458 \times 10⁻⁵ m²s⁻¹ at STP
- n non-dimensional leading-edge radius; $r/\sqrt{A_b}$
- nopt optimum or best value of n; provides lowest drag at least radius
- ψ yaw angle; deg (Figure 4)
- $\psi_{\mbox{\scriptsize M}}$ maximum value of yaw angle for which attached flow is required; deg

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EXHIBIT 6

MOTOR COACH INDUSTRIES ENGINEERING TEST REPORT

TEST NO.: 93-0026

DATE: AUGUST, 1993

DESCRIPTION:

A WIND TUNNEL INVESTIGATION OF THE AERODYNAMIC

CHARACTERISTICS OF BUSES

REPORT BY: INSTITUTE FOR AEROSPACE RESEARCH

SECTION NO .:

PART/ASSY NO .:

COACH UNIT NO .:

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COMMENTS:

MCI - 039853

APPENDIX 1: RUN LOG

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ABSTRACT

A wind tunnel test was performed to evaluate the aerodynamic drag of seven front-end shapes and 2 rear-end shapes for an intercity bus for Motor Coach Industries. The front-end shapes represented the current production bus - the CJ3, three competing buses, and three new designs. The rear-end shapes represented the current production bus and a new design. The wind tunnel measurements demonstrated that the best combination, consisting of the new rear plus the Proposal 1 front, produced a reduction in wind-averaged drag coefficient of 41.5% compared to the standard CJ3 configuration. This drag reduction is equivalent to a fuel saving of 8.75 litres for each 100 km travelled at a steady speed of 90 km/h and 14.63 litres for each 100 km travelled at 120 km/h. The new configuration had a lower drag coefficient than the three competitors.

RESUMÉ

Un essai en soufflerie a été réalisé pour évaluer la traînée aéreodynamique de sept formes d'avant et de deux formes d'arrière d'autocar pour Motor Coach Industries. Les formes de l'avant étaient celles d'un modèle de série (le CJ3), de trois modèles concurrents et de trois nouveaux modèles. Les formes de l'arrières étaient celles du modèle de série et d'un nouveau modèle. Les mesures ont permis de constater que la meilleure combinaison, soit le nouveau modèle d'arrière avec le projet d'avant n° 1, produisait une réduction de 41,5% du coefficient de traînée pondéré en fonction du vent par rapport à la configuration CJ3. Cette réduction représente une économie de carburant de 8,75 litres pour 100 kilomètres parcourus à une vitesse stabilisée de 90 km/h, et de 14,63 litres pour 100 kilomètres parcourus à une vitesse stabilisée de 120 km/h. Le coefficient de traînée de la nouvelle configuration était plus faible que celui des trois modèles concurrents.

1.0 INTRODUCTION

Aerodynamic forces and moments have an important influence on the operation of a high-speed, intercity bus. Aerodynamic drag absorbs a significant proportion of the engine power required at speed, thus affecting fuel consumption and passing acceleration. The aerodynamic side force, rolling moment, and yawing moment are important to handling because they provide a disturbance that deflects a bus from its path in the presence of side winds or passing vehicles.

A wind tunnel investigation was performed in the 2m x 3m wind tunnel of the Applied Aerodynamics Laboratory of the National Research Council to evaluate the influence of these parameters for a new bus designed by Motor Coach Industries, Winnipeg, Manitoba. The wind tunnel program was conducted with a 1:10 scale model of the bus and the purposes of the wind tunnel tests were:

- 1) to investigate alternative front-end and rear-end designs to determine which provided the lowest aerodynamic drag,
- 2) to determine the effect of mirrors and other detail modifications on the best front and rear combination from (1),
- 3) to compare the aerodynamic performance of the best combination with several competitive buses,
- 4) to estimate the fuel savings provided by the new design, relative to the current production bus and to the competition.

2.0 WIND TUNNEL SIMULATION

The wind tunnel simulation provides an approximation of the environment encountered by a bus moving along a road [1]1. In the wind tunnel, Figure 1, air is blown over a model mounted above a fixed groundboard that is specially-designed to simulate the effects of the road surface over which the real bus moves. The accuracy of the wind tunnel measurements will be functions of several parameters, the most important of which are the test Reynolds number, the level of model detail, and the effectiveness of the ground simulation. The level of model detail and the fixed ground plane will produce small errors in the absolute values of the measured aerodynamic forces. For example, the smooth model surfaces and fixed groundboard will cause the model drag measurements to be lower than for the full-scale bus. However, the differences in aerodynamic forces between any two configurations will not be influenced by these factors. Thus, the wind tunnel will be an accurate predictor of the changes between configurations and, therefore, provides a powerful tool for the aerodynamic optimization of a new bus design. The measured aerodynamic changes can be used to provide accurate estimates of the performance changes produced by any shape modification.

Many small details like side window framing, break lines in the body surface, wheel rotation, and heat exchanger airflows were not included in the model because past experience has shown that their effects were small and did not affect the aerodynamic differences measured

Numbers in square parentheses indicate references to be found following the main body of the text.

between major configurations. Previous wind tunnel tests have demonstrated that the measured aerodynamic changes correlate well with road measurements for commercial road vehicles [2]. In summary, the wind tunnel's main strength comes from its ability to predict the differences or increments between the various test configurations. Thus, even though a model might have simplified surface detailing, accurate drag differences between configurations will be obtained, and the wind tunnel will permit the reliable selection of the best aerodynamic configuration. In fact, the wind tunnel can provide much more accurate measurements of small aerodynamic changes than is possible from road tests.

The data measured in the wind tunnel need to be extrapolated to full scale. This requires a method of converting the measured forces and moments from model scale to full scale - done through the concept of the aerodynamic coefficient - and a mechanism for incorporating a realistic interpretation of the wind environment in which a road vehicle operates - provided by the wind-averaged drag coefficient. These items, as well as the effects of Reynolds number, will be discussed in the following sections.

2.1 Reynolds Number Effects

The Reynolds number is the aerodynamic similarity parameter, defined as

$$Re = 1.9x10^4 V_{rW} {1}$$

where

V_r = resultant airspeed due to combined wind and vehicle motion, equal to the wind tunnel test speed, km/h.

w = characteristic length, chosen as the maximum legal width, 2.59 m full scale, 0.259 m, model scale.

ideally, the Reynolds number should have the same value in the wind tunnel test as for the bus on the road to guarantee that the two flow fields are identical. This is not possible with a 1:10-scale model because the required test speed is approaching a speed where supersonic effects become significant. Fortunately, it turns out that the Reynolds number must only be high enough to guarantee that the boundary layers on the front face of the model becomes turbulent before reaching the front edges, requiring a Reynolds number of only 1.0x10⁶ to 2.0x10⁶ [3], compared to the full-scale value of 5.0x10⁶ at 100 km/h. The present tests were run near the maximum speed of the wind tunnel, providing a test Reynolds number of 1.4x10⁶, 28% of full scale at 100 km/h. This is sufficiently high for the majority of the tests, although flow tripping may be required for some of the smaller edge radii [3] to ensure full-scale behaviour.

2.2 Extrapolation to Full Scale - The Aerodynamic Coefficient

The measurements of aerodynamic force and moment made on the bus can be converted to a dimensionless form that are independent of model size and test speed, and are only a function of model shape and Reynolds number. This is done by dividing the measured forces and moments by reference forces and moments that are related to the test airspeed and to the model size. Taking drag as an example, if the drag force is divided by a reference force formed as a product of the

test airstream pressure, the reference dynamic pressure, and a model reference area, commonly chosen to be the frontal area at zero yaw angle, then the drag coefficient is defined as

$$C_{\rm D} = \left[\frac{\rm D}{\rm qA}\right] = \left[\frac{\rm D}{3.858 \times 10^{-2} \, \rm pV_r^2 \, A}\right] \tag{2}$$

where

D = aerodynamic drag force, N.

 $(3.858 \times 10^{-2} \text{ pV}_{\text{r}}^2)$ = dynamic pressure, Pascals

p = air density, 1.226 kg/m³ at S.T.P.

A = reference frontal area, 8.358 m² full scale, 0.08358 m² model scale

Equation (2) has units of N./N., and so possess no dimensions. The full-scale drag value can be calculated from the same relationship, at any full-scale airspeed, by substitution of that airspeed, the full-scale frontal area, and the measured, model-scale drag coefficient into the inverted equation.

The moments are non-dimensionalized in a similar fashion, except that a reference moment is required in these cases. This moment is based on the reference force defined above, times an arbitrary moment arm that is commonly chosen to be the vehicle wheelbase, which is taken here as the distance between the front axle and the drive axle. Using yawing moment as an example, the yawing moment coefficient is defined as

$$C_{N} = \left[\frac{N}{qAb}\right] = \left[\frac{N}{3.858 \times 10^{-2} \, \text{pV}_{r}^{2} \, \text{Ab}}\right] \tag{3}$$

where

N = aerodynamic yawing moment, N-m.

b = reference length, chosen as wheelbase, 7.225 m. full scale, 0.7225 m. model scale.

The other two force coefficients - lift and side force - and the other two moment coefficients - pitch and roll - are defined in exactly the same way.

2.3 Effects of the Natural Wind

The Earth's surface winds blow with random magnitude and direction relative to the direction of motion of a bus, causing random, time-varying changes in the resultant velocity vector at the bus. The main effect of the wind, from the perspective of the wind tunnel flow simulation, is to produce a non-zero yaw angle at the bus. This angle can be simulated in the wind tunnel by rotating the model about a vertical axis, relative to the direction of the approaching airstream. The resultant velocity vector produced by a combination of wind and bus motion is shown in the vector diagram of Figure 2, and its direction and magnitude can be calculated from

$$\psi = \tan^{-1} \left\{ \frac{\left[\left(V_{W} / V_{D} \right) \sin \phi \right]}{\left[1 + \left(V_{W} / V_{D} \right) \cos \phi \right]} \right\} \quad \text{deg.}$$
 (4)

and

$$V_{r} = V_{b} \left\{ 1 + (V_{w}/V_{b})^{2} + 2(V_{w}/V_{b})\cos\phi \right\}^{1/2}$$
 km/h. (5)

where

Ψ = wind-induced yaw angle, deg.

wind direction relative to the direction of bus motion, deg.

 $V_W = wind speed, km/h$.

 V_b = bus road speed, km/h.

 $V_r = resultant airspeed, km/h.$

An example of the effect of the natural wind on the yaw angles encountered by a vehicle operating at constant speed is presented in Figure 3. This graph shows the probability of exceeding a given yaw angle at a road speed of 90 km/h and it can be seen that the yaw angle induced by the wind is at or below 9° for 90% of the time. A higher road speed reduces the angle range while a lower road speed increases it.

The random variation of the resultant velocity vector means that no single yaw angle represents the average drag of a bus on the road and that the resultant airspeed is almost never equal to the road speed. The typical drag level on the road consists of a weighted average over the yaw curve, where the weighting must reflect the probabilistic effects of the wind. The concept of the "wind-averaged" drag coefficient, $C_D(V_b)$, has been developed to quantify these wind effects, as defined in the SAE Recommended Practice for the Wind Tunnel Testing of Trucks and Buses [4], and as discussed in [5]. The wind-averaged drag coefficient is defined as

$$\overline{C}_{1}(V_{b}) = \frac{1}{2\pi} \int_{0}^{2\pi} C_{D}(\psi) [V_{t}/V_{b}]^{2} d\phi = \frac{1}{2\pi} \int_{0}^{2\pi} C_{D}(\psi) [1 + (11/V_{b})^{2} + 2 \cdot (11/V_{b}) \cos \phi] d\phi$$
 (6)

The wind-averaged drag coefficient is obtained by averaging the drag coefficient curve over the range of yaw angles produced by the national annual average mean hourly wind at bus mid-height of 11 km/h, assumed to blow equally probably from all directions, weighted by the ratio of the resultant speed to the road speed, $(V_I/V_b)^2$, to convert to the road speed of the bus as the reference speed. The use of this single wind speed and the equally-probable directional assumption are well supported by meterological data averaged at 32 sites across Canada. In this fashion, each drag-coefficient-versus-yaw-angle curve is reduced to a single, weighted, average, drag coefficient for every road speed, V_b , greatly facilitating data comparisons and providing a more meaningful number for the estimation of global fuel usage. The wind-averaged drag coefficient also simplifies the computation of bus fuel consumption or speed performance since the road speed is now the reference speed, rather than the varying, resultant airspeed, whose effects are now included in the drag coefficient. The wind-averaged drag coefficient represents the average performance of many buses operated over the entire country for a long period of time. The average drag coefficients for specific regions and specific seasons would differ from this value.

As the road speed varies, the yaw angles produced by the mean wind will change. At low bus speeds, V_r will be increasingly larger than V_b (equation 2) and the maximum yaw angle (equation 1) will increase also. Both of these trends will increase $\overline{C}_D(V_b)$ as V_b decreases. The change in $\overline{C}_D(V_b)$ with road speed can be conveniently related to the value at 90 km/h, a common maximum legal speed, by

$$\bar{C}_D(V_b) = \bar{C}_D(90) [90/V_b]^{0.22}$$
 (7)

This equation is a fit of the wind-averaged drag coefficient between 70 km/h and 120 km/h and slightly under-predicts the wind-averaged drag coefficient below 70 km/h. The wind-averaged drag coefficient is now based on the road speed, V_b, and the wind-averaged aerodynamic drag is given by

$$\overline{D}(V_b) = 3.858 \times 10^{-2} \rho V_b^2 \left(\overline{C}_D(V_b) \cdot A \right) \tag{8}$$

The variation of the wind-averaged drag and of wind-averaged drag coefficient with changing bus road speed are emphasized by explicitly indicating their functional dependence on V_b.

3.0 EFFECTS OF AERODYNAMICS ON PERFORMANCE

Aerodynamic forces and moments can affect several aspects of the performance of a bus. Aerodynamic drag is a major component of the total resistance which must be overcome by the engine. Thus, it will have an effect on fuel consumption and on high-speed acceleration. As previously mentioned, the aerodynamic side force and yawing moment produced by the action of the natural wind or adjacent vehicles, and to a lesser extent the associated aerodynamic rolling moment, can deflect the bus from its intended path. The aerodynamic lift and pitching moment cause a change to the vertical reaction forces at the wheels, typically reducing the load on the front wheels and increasing the load on the rear wheels. These latter effects are so small for a bus, compared to passenger and cargo weight changes, that their effects can be ignored. The other items will be discussed in the following sections.

3.1 Fuel Consumption

The fuel consumed by the engine is directly proportional to the total tractive effort required to propel the bus at a given speed. The total resistance that the engine must overcome at a constant speed is composed of the following major elements:

- rolling resistance due to tires and wheel bearings,
- drive line losses in transmitting engine power from the flywheel to the drive wheels.
- grade resistance due to climbing or descending hills,
- cornering resistance due to increased tire rolling resistance in corners,

- parasitic losses due to pumps and fans,

 aerodynamic drag due to an interaction between the moving bus and the windy atmosphere.

At speeds above 90 km/h, the aerodynamic drag becomes the largest component of propulsive power. For example, at a constant speed of 90 km/h on a flat, straight road, it is estimated by equation (15) that 40% of the fuel is consumed by aerodynamic drag, 30% by rolling resistance and 30% by accessories for the standard MCI CJ3 bus (Fig. 5). At 120 km/h, the aerodynamic component of fuel usage increases to 52% of the fuel consumed. Even if the terrain is curved and hilly, the aerodynamic drag will consume the same amount of fuel as on a flat road at the same average speed although, because of the additional fuel required for corners and hill climbing, the percentage of the total will be reduced. The aerodynamic drag on a bus is primarily due to retarding pressure forces - positive on the front end and negative on the rear end. Smaller additional contributions are made by skin friction and parasitic losses due to exposed running gear, miscellaneous protruding frames, and underbody roughness.

The power at the drive wheels required to propel the bus at a road speed of V_b km/h, can be written as

$$P(V_b) = \left[\frac{D_1(V_b) V_b}{3600} \right] \text{ kw.}$$
 (9)

and the corresponding engine power is

$$P_{e}(V_{b}) = \left[\frac{D_{t}(V_{b}) \ V_{b}}{3600 \ \eta}\right] + P_{o} \quad kw. \tag{10}$$

where

 transmission efficiency factor, assumed to be 0.85 for a single drive axle.

 P_a = power used by the accessories, kw.

 $D_f(V_b)$ = total resistance to motion, aerodynamic drag plus rolling resistance, N. = $[\overline{D}(V_b) + R]$

The rolling resistance, R, can be represented by

$$R = (a_1 + a_2 V_b) M - N, (11)$$

where

Vb = road speed, km/h.

M = bus mass, kg.

a; = rolling resistance coefficients

Typical values for the two rolling resistance constants for radial truck or bus tires are

$$a_1 = 5.3 \times 10^{-2}$$
 N/kg. and $a_2 = 4.0 \times 10^{-4}$ N-hr/kg-km. (12)

The accessory power requirements are difficult to determine. Part of the accessory load will be variable, even at constant rpm, due to fluctuating demands for electrical power and air conditioning. Other components of this load, such as power to the cooling fan, will be rpm dependent. A single linear dependence of accessory power requirements versus road speed was assumed as an approximation to the accessory power demand. While the assumed power function will probably under-predict the accessory power requirements at low speeds, in the intermediate gears, it should provide a reasonable full-load estimate at higher speeds in top gear, where aerodynamic effects are dominant. The following function was assumed for the accessory power requirements as a function of engine power level and road speed

$$P_a = P_o \left[7.70 \times 10^{-3} + 1.50 \times 10^{-3} \text{ Vb} \right] \text{ kw.}$$
 (13)

where

Po = engine power rating, kw.

Substitution of equations (2), (7), (11), and (13) in equation (10) gives the total engine power as

$$\overline{P}_{e}(V_{b}) = \left[\frac{\left(5.30 \times 10^{-2} + 4.00 \times 10^{-4} V_{b}\right) M V_{b}}{3600 \, \eta} + \left[\frac{3.858 \times 10^{-2} \rho V_{b}^{3} \left(\overline{C}_{D}(V_{b}) \cdot A\right)}{3600 \, \eta} \right] + \left[P_{o} \cdot \left(7.70 \times 10^{-3} + 1.50 \times 10^{-3} V_{b} \right) \right]$$

$$(14)$$

Note that the wind-averaged drag coefficient is used in the aerodynamic drag equation in place of the regular drag coefficient, so necessitating the use of the road speed, V_b, in the calculation, instead of the resultant airspeed. The three major terms in equation (14) are plotted in Figure 4 for the standard CJ3 configuration. The wind-averaged drag coefficient used was the speed-dependent wind-averaged drag coefficient, equation (8). The drag coefficient at 90 km/h was 0.732, the frontal area was 8.36 m², the assumed bus mass was 16500 kg, the engine power was 300 kw, and the transmission efficiency was 0.85. The fuel consumed at a given power level is obtained by using the specific fuel consumption of the engine. A useful average value, characteristic of turbo-charged diesel engines, is SFC = 0.275 ½/kw-h (0.045 lmp. gal/hp-h or 0.38 lb/hp-h). The fuel consumed per 100 kilometres is given by

$$\mu = \left[\frac{100 \cdot \text{SFC} \cdot P_e}{V_b}\right] = 27.5 \left[\frac{P_\theta}{V_b}\right] \quad \ell/100 \text{-km}. \tag{15}$$

Combining equations (14) and (15), the wind-averaged bus fuel consumption, $\overline{\mu}(V_b)$, can be expressed in terms of vehicle size, mass, road speed, and wind-averaged drag coefficient by

$$\overline{\mu}(V_b) = \left[\frac{\left(1.46 + 1.10 \times 10^{-2} V_b \right) M}{3600 \, \eta} \right] + \left[\frac{1.061 p V_b^2 \left(\overline{C}_D(V_b) \cdot A\right)}{3600 \, \eta} \right] + \left[P_o \cdot \left(\frac{2.12 \times 10^{-1}}{V_b} + 4.13 \times 10^{-2} \right) \right] 2/100 - km.$$
(16)

Inverting the fuel usage calculated from equation (16) and dividing by 100 will give the fuel consumption in km/ ℓ . Equation (16) shows that the fuel consumed by aerodynamic drag varies directly with the frontal area, the drag coefficient and with the square of speed. The latter variation is the reason for the importance of aerodynamic effects at higher speeds. The primary aerodynamic parameter is the product of drag coefficient and frontal area, $\overline{C}_D(V_b)$ -A, often termed the drag-area. The fuel consumed by rolling friction is only a weak function of speed, being approximately proportional to $V_b^{1/4}$. The three terms of equation (16) are plotted in Figure 5 and the relative importance of the fuel consumed to overcome aerodynamic drag at high

speed is evident. The change in fuel consumption due to a change in aerodynamic drag is given by

$$\Delta\mu(V_b) = 2.947 \times 10^{-4} \rho V_b^2 \left(\Delta \overline{C}_D(V_b) \cdot A \right) / \eta \quad \ell / 100 - km.$$
 (17)

where $\Delta C_D = C_D$ (reference) - C_D (modified) is the difference in wind-averaged drag coefficient between the original and the modified configurations. This equation will be used frequently to compute fuel savings in the discussions that follow.

3.2 Cross-wind Handling

The deflection of the bus from it's path under the influence of side winds cannot be computed simply from aerodynamic force and moment measurements alone, but must be obtained from a dynamic analysis of the bus and its driver. However, it is possible to make a few general statements about the static directional stability of the bus as a guide to assessing the qualitative effects of changes in the lateral aerodynamic forces and moments. The lateral aerodynamic quantities that affect cross-wind handling are comprised of the side force, the yawing moment, and the rolling moment, and are defined in the sketch of Figure 6.

The side force and the yawing moment have the strongest effect on the lateral deviation of the bus from its path when acted on by a side wind, with the yawing moment being the most important parameter. The rolling moment is a second-order parameter through the influence of roll angle on roll-induced steering - a function of the suspension design.

The side force and the yawing moment both act to deflect the bus away from the direction of the incident wind and are, as a consequence, statically destabilizing (weathercock unstable). If the driver takes no corrective action, the bus would leave the road. The side force and the yawing moment are coupled, since the side force, acting at some point along the length of the bus termed the yaw centre of pressure, can be considered to have produced the yawing moment.

Similarly, the side force and the rolling moment are coupled, except that the roll centre of pressure is measured vertically from the co-ordinate reference centre at ground level.

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The side force variation with yaw angle is nearly the same for most bus configurations while the yawing moment varies more with bus shape. Effectively, the yaw centre of pressure moves forward or rearward along the length of the bus as the front and rear shapes are changed. A bluff body, like a square-edged rectangular block, has a yaw centre of pressure at the midlength point of the body. A streamlined shape, like an aerofoil, has the yaw centre of pressure at a point one-quarter of the aerofoil length aft of the leading edge. A bus, being well streamlined at the front end, may have its centre of pressure even farther forward. As a bus becomes more streamlined and develops lower aerodynamic drag, so its centre of pressure moves forward, and the bus becomes tess weathercock stable. Simply put, it blows around more in the wind. Again, without a complete dynamic analysis, it is impossible to quantify the degradation in cross-wind handling. However, there is an anecdotal measure of this effect available.

It was reported by MCI engineering staff that a few drivers have commented that the MCI CJ3 bus is better handling in a cross wind than the Prevost H3-40. It appears that only some drivers have noticed this handling difference, and they say that it is not large. Thus the aerodynamic differences between these configurations, both of which were tested in this program, define the boundary of a just-perceptible threshold in yawing moment change or, equivalently, yaw centre of pressure movement. The centre of pressure location for a small range of yaw angles near zero yaw can be obtained from the ratio of the slope of the yawing moment coefficient curve divided by the slope of the side force coefficient curve. Analytically, this is expressed as

$$\left(x_{cp}/b\right) = \left[\frac{dC_N/d\psi}{dC_S/d\psi}\right] \tag{18}$$

where

x_{cp} = location of the centre of pressure ahead of the chosen moment centre at the mid-wheelbase point, m.

b = reference length, 7.225 m.full scale, 0.7225 m. model scale

 $dC_N/d\psi$ = slope of the yawing moment coefficient versus yaw angle curve for the yaw range between $\pm 3^\circ$, deg.⁻¹

 $dC_S/d\psi$ = slope of the side force coefficient versus yaw angle curve for the yaw range between $\pm 3^\circ$, deg. 1

The locations of the yaw centres of pressure for the two configurations just mentioned, measured forward from the mid-wheelbase point, were found to be

CONFIGURATION	(x _{cp})
MCI (#37)	2.06 m.
Provinct (#63)	2.29 m.

Thus a forward, destabilizing movement of the centre of pressure of about 0.23 m. is just detectable by some drivers and several times this change might be acceptable.

4.0 TEST PROGRAM

The primary purpose of the wind tunnel test program was to select the front and rear end shapes from the new proposals that gave the lowest aerodynamic drag, while a secondary purpose was the comparison of the best of the new proposals with the current MCI bus and with buses from competing manufacturers. At the same time, the remaining aerodynamic forces and moments were measured so that their effects on stability and cross-wind handling could be assessed. Both smoke and a surface oil film were used to visualize the flow over and on the surface of the best combination. The test program is summarized in the Run Log of Appendix 1.

4.1 Model Installation

A 1:10 scale model of the bus chassis was mounted on the standard NRC vehicle ground plane, Figure 1. The model accurately duplicated the external geometry of the bus. The seven front-end shapes, one of the two rear-end shapes, and the body side and roof panels were numerically milled from mahogany. The second rear end was manufactured using stereo-lithography. The body components were attached to chassis and running gear manufactured from aluminum. The model included such details as fenders, wheels and wheel welfs, drip rails, escape hatches, and mirrors. No internal flows, air intakes, underbody roughness, engine bay openings, or window frames were reproduced. The former were excluded because of the difficulty of representing cooling flows adequately at model scale and because their effects would be the same for each configuration, and the latter because the frames were so shallow as to be unimportant and the other openings were too complex and, once again, would cause no relative difference between configurations. The external surfaces of the model were smooth and leakfree, representing flush windows, doors, and seals. The front and rear faces of the bus could be readily removed to permit the testing of alternate components.

The bus was connected to the six-component, mechanical balance of the wind tunnel by pins extending from the standard model-mounting plate, through the groundboard cover plate, into the front and rear tire contact patches. This provided an aerodynamic-interference-free mounting. The six balance outputs were averaged digitally over a 10 second period at repetition rates of 20 samples per second per channel to form stable averages with an overall measuring accuracy of ±0.5%.

4.2 Model Configurations

The two prototype front-end shapes had been designed to provide good aerodynamics through a combination of windshield slope, face curvature, and edge rounding, within the bounds of aesthetic, engineering, and operational requirements. The other five front ends included the current MCI CJ3 production bus and three competitors designs. One alternate rear-end shape to the standard was tested, based on the optimal-design information presented in [3]. The effect of additional components such as drip rails, escape hatches, and mirror shape and location were also investigated. The bus model was designed to permit the rapid evaluation of alternate front-end and rear-end designs through the use of removable components. The model chassis, the seven front ends, and the two rear ends that were tested are shown in the drawings of Figure 7 and the photographs of Figure 1. A complete set of photographs of all of the model configurations

tested is presented in Appendix 2.

The front-end shapes consisted of the following:

1) Standard CJ3	The standard CJ3 front including all window
	moulding details.
2) Smooth CJ3	A modified CJ3 front with larger edge radii
	and flush glass.
3) Proposal 1	A new design with flush glass.
4) Proposal 2	A new design with flush glass.
5) Prevest H3-40	Competitor.
6) Mercedes 0404	Competitor,
7) Setra S315	Competitor.

The rear-end shapes consisted of the following:

1)	Standard	CJ3	Top and sides parallel to the top and sides of the
			main bus with 204 mm rear-edge radii.
2)	Bevelled	Rear	Roof and sides of the body bevelled at an angle of
			15° to the main panels over the last 1m of the body
			with rear-edge radii of 51 mm.

4.3 Definition of the Measurement Coordinate System

Six components of aerodynamic force and moment were measured simultaneously. The measurements in this report are presented in a body-fixed co-ordinate system that is defined in Figure 6. These measured forces and moments were reduced to coefficient form as defined in the Notation, Section 8.0, and as discussed in Section 2.2.

4.4 Test Procedure

Each configuration was tested over a range of eight yaw angles from -3° to +12° in the following sequence: -3.0°, -1.5°, 0.0°, 1.5°, 3.0°, 6.0°, 9.0°, 12.0°. The yaw angles were set by rotating the model in the wind tunnel sequentially through the required set of angles, under computer control, and pausing at each angle sufficiently long to acquire the necessary measurements. The yaw tests were performed at a wind speed of 302 km/h (84 m/sec). At this speed, the model Reynolds numbers were 0.34 and 0.26 of those of the full-scale bus at 90 km/h and 115 km/h, respectively. Additional tests were also made over a range of Reynolds numbers at 0° yaw angle to investigate the Reynolds number sensitivity of the drag. Some tests were also run with strips of grit upstream of the rounded front edges to ensure that the boundary layers on the front face had gone through transition before the flow reached the edges.

5.0 RESULTS

The following presentations, discussions and interpretations of results focus primarily on aerodynamic drag, although the location of the yaw centre of pressure for important configurations will be presented to allow an assessment of cross-wind handling changes. A total of 37 runs were performed during the wind tunnel test. A detailed summary of these runs is given in Appendix 1. In addition, this Appendix summarizes the wind-averaged drag coefficients at a road speed of 90 km/h. Appendix 3 contains a complete tabulation of the wind tunnel data and Appendix 4 presents plots of all the aerodynamic coefficients.

6.0 DISCUSSION AND INTERPRETATION OF RESULTS

This Section presents the major findings of the investigation and summarizes these in terms of the measured changes in wind-averaged drag coefficients, in terms of the expected changes in fuel consumption that would result, and in terms of the changes in cross-wind sensitivity that accompany the drag changes. The changes in fuel consumption were computed only at 90 km/h and 120 km/h.

The best combination of front and rear components was selected from the three new front-end and two rear-end designs. This combination was compared in detail to the standard MCI 102 CJ3 bus and to the three competitors from the point of view of fuel usage.

6.1 Reynolds Number Effects

After the first set of measurements were made with the seven front ends, an examination of the data showed an apparent anomaly in the yaw data for the Proposal 2 front end at yaw angles greater than +3°, where the drag was observed to increase more rapidly than would be expected. This was judged to be a result of leading-edge flow separation due to insufficiently high Reynolds number for this configuration. No other configuration showed this effect. It was decided to trip the flow on this and the three other smooth, front-end configurations - Proposal 1, Smooth CJ3, and Prevost H3-40 - to make sure that such effects were eliminated. Fine, #40-grit particles were sprinkled sparsely on 0.5-cm wide strips of glue painted on each front face, just upstream of the front edges, to encourage early boundary layer transition. A typical application is shown in photograph P??. A comparison of the variation of drag coefficient with Reynolds number at 0° yaw angle of the four, smooth-edged configurations is presented in Figure 8, with and without the trip strips.

Generally, the absence of a trip results in high drag coefficients at low Reynolds numbers, followed by a rapid drop in drag coefficient above some threshold Reynolds number that varies from model to model. This drop results from the natural transition of the boundary layer on the front face of each model from laminar to turbulent, so reducing the occurrence of flow separation from the front edges. The presence of the grit strips ensures that the flow is turbulent, causing the drag drop at much lower Reynolds numbers. The end result is a flow field on the model that is more typical of the full scale bus at its higher operating Reynolds number.

\$\$ 14.00% (1.00%) (1.

The effect of the flow trips on the yaw behaviour of these four configurations at the test Reynolds number of 1.4×10^6 is summarized in Figure 9. The measurements with and without grit on the Smooth CJ3 front and the Proposal 1 front are identical. The presence of the trip lowers the drag on the Prevost front slightly at yaw angles $\le 6^\circ$ and smooths the drag curve at higher yaw angles. The flow trip had the greatest effect on the Proposal 2 front configuration substantially lowered its drag coefficients for yaw angles above 3° .

The remainder of the measurements on these four configurations were made with the trips present because they were felt to better represent full scale.

6.2 Front-End Shape Effects

The first set of measurements were made to select the best new front-end shape from the new proposals. All the front ends were tested without mirrors and with the standard CJ3 rear end. Figure 10 summarizes the drag results for the new front-end shapes. It shows that all three of the new shapes are nearly identical to each other and are better than the current MCI CJ3 front. The Proposal 2 shape was chosen by the attending MCI engineers as the best shape because of its good aerodynamic performance, its ease of manufacture compared to Proposal 1, and because of its styling. Figure 11 compares the standard MCI front end and the Proposal 2 shape with shapes used by the competition. Both the Setra and the Mercedes front ends have higher drag than the standard MCI shape and much higher drag than the Prevost or the MCI Proposal 2 shapes. The MCI Proposal 2 shape has slightly lower drag than the Prevost shape for $\psi \le 3^\circ$ and increasingly lower drag at higher yaw angles. Table 6.1 summarizes the wind-averaged drag coefficients, the fuel consumption changes, and centre-of-pressure locations for these seven geometries. Figure 12 compares the side force and the yawing moment coefficients. The higher-drag front ends usually have the lower yawing moments and, consequently, smaller magnitudes for the yaw centre of pressure locations, as also seen in Table 6.1.

TABLE 6.1: FRONT-END SHAPE EFFECTS WITH CJ3 REAR

	90	km.	/h	1	/h		
CONFIGURATION	\overline{c}_{D}	$\Delta \overline{c}_D$	$\Delta \overline{\mu}^*$	\overline{c}_{D}	$\Delta \overline{C}_D$	Δμື*	x _{cp} #
STD CJ3, #19	0.584			0,558			1.95
SMOOTH CJ3, #72	0.380 (0.204	5.87	0.370	0.188	9.62	2.29
PROPOSAL 1, #69	0.367 (0.217	6.25	0.360	0.198	10.13	2.40
PROPOSAL 2, #40	0.365	0.219	6,30	0.357	0.201	10.29	2.25
PREVOST, #65	0.418	0.166	4.78	0.386	0.172	8.8	2.06
SETRA, #35	0.625 -0	0.041	-1.18	0.601	-0.043	-2.20	1.98
MERCEDES, #22	0.620 -0	0.036	-1.04	0.598	0.040	-2.05	1.62

^{*} change in fuel consumption, 2/100-km., positive represents a fuel saving.

[#] distance in m, forward of the mid-wheelbase point.

6.3 Rear-End Shape Effects

The alternate rear end utilized the optimum rear body bevel angle of 15° and bevel length of 1.0 m full scale, as specified in [3]. This geometry has the potential to reduce the base drag by 40% to 60%, based on the data presented in [3], with the level of reduction being dependant on the shape of the forward part of the bus. This rear shape is compared to the standard, CJ3 rear shape, both with and without the standard, CJ3 mirrors in Figure 13. The effects of mirrors will be discussed in more detail in the following Section. The new rear shape reduces the drag and moves x_{cp} forward in both cases. The wind-averaged drag coefficients, fuel consumption changes, and centre-of-pressure locations are presented in Table 6.2.

TABLE 6.2: EFFECT OF BEVELLED REAR WITH PROPOSAL 2 FRONT

	9	0 km/h		12			
CONFIGURATION	\overline{c}_{D}	ΔCD	$\Delta \overline{\mu}^*$	<u>c</u> D	$\Delta \overline{C}_D$	$\Delta\overline{\mu}^*$	Хср
CJ3 REAR, NO MIR, #40 BEV REAR, NO MIR, #51	0.365 0.299	0.066	1.90	0.357 0.295	0,062	3.17	2.25 2.78
CJ3 REAR, CJ3 MIR, #42 BEV REAR, CJ3 MIR, #53	0.394 0.339	0.055	1.58	0.385 0.331	0.054	2.76	2.28 2.80

change in fuel consumption, 4/100-km., positive represents a fuel saving.

6.4 Mirrors

The effects of mirror shape and position were investigated for the Proposal 2 front with the CJ3 rear. Three sets of mirrors were fabricated - the current MCI design, the Prevost design, and the Setra design. The Setra and Prevost mirrors were mounted in one position only, photographs P13 and P14, while the MCI mirrors were mounted with three alternate positions. These positions were forward, aft, and asymmetrical, as shown in photographs P11, P12, and P16. The asymmetrical configuration is more representative of real operation, where the lefthand mirror was set more aft than the right-hand mirror, which was set in the forward position. The effect of mirror position and type can be seen in Figure 14. The addition of any mirror is seen to increase the drag, with the Setra mirrors causing the largest increase. The standard MCI mirrors produced higher drag in the aft position than in the forward position. This may be explained by the fact that the planes of the mirrors in the forward positions were nearly parallel to the flow around the front, side edges, whereas they were more nearly perpendicular to the flow in the aft position. The drag coefficients for the asymmetrical positions were between the values for the other two positions. The Prevost mirrors provided slightly lower drag than the MCI mirrors for y≤3° but much higher drag above this angle. Apparently, the Prevost mirrors caused flow separation over at least part of the downwind side of the bus. The results of the mirror variations are summarized in Table 6.3.

[#] distance in m. forward of the mid-wheelbase point.

TABLE 6.3: MIRROR EFFECTS WITH PROPOSAL 2 FRONT AND CJ3 REAR

	90 km/h			120 km/h			
CONFIGURATION	\overline{c}_{D}	ΔCD	$\Delta\overline{\mu}^{\star}$	¯c _D	ΔCD	$\Delta \overline{\mu}^*$	
NO MIRRORS, #40	0.365			0.357			
MCI MIRRORS FWD, #42	0.394 -	0.029	-0.83	0.385	-0.028	-2.20	
MCI MIRRORS AFT, #44	0.405 -	0.040	-1.15	0.398	-0.041	-3.07	
MCI ASSYM, MIRRORS*	0.415 -	0.050	-1.44	0.403	-0.046	-2.35	
SETRA MIRRORS, #46	0.434 -	0.069	-1.99	0.425	-0.068	-4.35	
PREVOST MIRRORS, #48	0.422 -	0.057	-1.64	0.397	-0.040	-1.84	

^{*} change in fuel consumption, 2/100-km., positive represents a fuel saving.

6.5 Miscellaneous Modifications

A series of small modifications were made to investigate the following:

- wheel skirts closing the sides of the wheel wells, P17; Run # 57
- a front air dam below and behind the bumper, P18; Run # 58
- thre fairings to shield the tires from the oncoming flow, P19; Run # 59
- rear side vortex generators, P20; Run # 60
- a modified drip rail, P21; Run # 61

Most of these modifications had only small effects on the drag. Of them, only the wheel skirts produced a drag reduction while the remainder produced no change or a drag increase. The results of these tests are summarized in Table 6.4.

TABLE 6.4: MISCELLANEOUS SMALL MODIFICATIONS TO THE PROPOSAL 2 FRONT WITH BEVELLED REAR AND ASYMMETRICAL MIRRORS

	90 km/h			120 km/h		
CONFIGURATION	$\overline{\mathbf{c}}_{D}$	$\Delta \overline{\mathbf{c}}_{\mathbf{D}}$	$\Delta\overline{\mu}^{ullet}$	$ar{c}_{D}$	$\Delta \overline{c}_{D}$	Δπ.
STANDARD, #55	0.349			0.341		
WHEEL FAIRINGS, #57	0.330	0.019	0.55	0.324	0.017	0.31
AIR DAM, #58	0.393	-0.044	-1.27	0.380	-0.038	-1.94
TIRE FAIRINGS, #59	0.353	-0.004	-0.23	0.349	-0,008	-0.41
VORTEX GENERATORS, #60	0.354	-0.005	-0.14	0.346	-0.005	-0.31

^{*} change in fuel consumption, 2/100-km., positive represents a fuel saving.

-

^{*} estimated as #40+(#55-#51).

6.6 The Best Combination

A comparison can now be made between the best new configuration, the Proposal 2 front with the bevelled rear, the current production MCI CJ3 bus, the Prevost H3-40 bus, the Mercedes 0404 bus, and the Setra S315 bus. These configurations were composed of the following elements:

New MCI -	Proposal 2 front, bevelled rear, asymmetrical mirrors
MCI CJ3	- CJ3 front, CJ3 rear, asymmetrical mirrors (estimate)
Prevost H3-40	- Prevost front, CJ3 rear, Prevost mirrors
Mercedes 0404	- Mercedes front, CJ3 rear, Prevost mirrors (estimate)
Setra S315	- Setra front, CJ3 rear, Setra mirrors (estimate)

Estimates were used for the drag of most of the mirror geometries because not all of the front-end configurations were tested with the required mirrors or mirror locations. In each case where an estimate was made, the additional drag increment due to the mirror change, based on the mirror measurements made with the Proposal 2 front, were added to account for these mirrors on the other bus shapes. Table 6.5 summarizes the differences in drag and fuel consumption between these configurations, using the Proposal 2 configuration as the reference. The drag increments added to account for the incorrect mirror geometries are summarized in the table. Thus, the wind-averaged drag coefficients quoted are those for the run indicated, plus the additional mirror drag increment, $\Delta C_{\rm D_{mir}}$.

TABLE 6.5: COMPARISON OF FULLY-EQUIPPED BUSES

		9	0 km/h	Į.		12	0 km/h		
CONFIGURATION	$\Delta \overline{C}_{D_{mli}}$	C _D ♣	$\Delta \overline{c}_{D}$	$\Delta \overline{\mu}^*$	ΔĈD _{mli}	ĆD	Δ <mark>C</mark> O*	$\Delta \overline{\mu}^*$	X _{cp} #
NEW MCI, #55		0.349				0.341			2.81
MCI CJ3, #37	0.010	0.606	-0.257	-7.40	0.010	0.581	-0.240	-12.28	2.06
PREVOST, #63		0.447	-0.098	-2.82		0.415	-0.074	-3.79	2,29
MERCEDES, #22	0.029	0.649	-0.300	-8.64	0.029	0.627	-0.286	-14.63	1.62
SETRA, #35	0.069	0.694	-0.345	-9.93	0.068	0.669	-0.328	-16.78	1.98

^{*} equal to the wind-averaged drag coefficient for the run number stated plus the mirror drag increment $^{\Delta C}D_{mir}$.

The drag coefficient curves for these configurations are compared in Figure 15 and the side force and yawing moment coefficient curves are presented in Figure 16. Once again, estimated mirror drag coefficients have been added to the configurations noted above. The key for Figure 15 summarizes the measurements that were combined to produce the curves plotted.

^{*} change in fuel consumption, 2/100-km., positive represents a fuel saving.

[#] distance in m. forward of the mid-wheelbase point.

Figure 17 compares the fuel consumption of the new design with those of the other four main configurations, as functions of road speed, for identical masses of 16,500 kg, identical drive-line losses of 15%, and identical frontal areas of 8.36 m². The new bus is seen to provide a large reduction in fuel consumption compared to the standard MCI CJ3 bus and the two European buses, and a substantial advantage over the Prevost bus. The current MCI CJ3 is inferior to the Prevost H3-40. The improvement of the new configuration over the MCI CJ3 results from both front and rear shape improvements while the advantage over the Prevost bus comes primarily from the rear-end shape. The new MCI configuration would have a yaw centre of pressure location that is 0.52 m ahead of that for the Prevost bus.

6.7 Flow Visualization

The flow over the best combination was observed, or visualized, using two techniques. First, smoke was used to obtain a gross overview of the external flow field and, second, a fine pigment suspended in an oil mixture was painted on the surface of the bus to show the details of the surface flow. Both flow visualization techniques were performed at zero yaw angle only.

The smoke flow photographs of Figure 18 show a few important details of the flow. Figures 18a, 18b, and 18c clearly indicate that the gross flow follows the contour of the bus, both up over the front top edges and down over the rear bevel. Figure 18d shows the wake of a mirror extending along the side of the bus.

The surface-oil-flow photographs of Figure 19 contain more detail than do the smoke flow photographs. Figure 19a shows the stagnation point on the front face of the bus. The flow streamline that strikes the bus at this point comes to a complete stop, providing the point of highest positive pressure on the front face. The remaining streamlines turn and diverge from this point. While the smoke showed that the flow around the front edges was attached, the oil flow shows that there is a very small separation region, or bubble, at the downstream edges of the top and side corners. Here, the flow separates and immediately re-attaches, producing a small separated cavity parallel to these corners, as indicated by the accumulations of oil. The small separation causes little or no drag increase although it indicates that the edge radius should be increased for a greater margin from separation - an observation that is consistent with the Reynolds number sensitivity observed for this configuration.

The influence of the mirror can be seen over the full length of the side of the bus in Figures 19b and 19c. The two lines above and below the mirror on the bus body indicate separation lines feeding a pair of vortices induced by the mirror. These vortices contribute to the drag increase caused by the mirrors and could be a source of aerodynamic noise. The mirror on the driver's side, in the aft position, showed an almost identical flow pattern.

Figure 19d shows the rear-end flow. The flow is attached on the bevelled top and side panels and is separated over the bluff base. It appears that a horizontal, trapped vortex sits on the upper third of the base, in the region that is covered with the oil mixture. It is fed by the flow over the roof and along the upper sides of the body. The strength of this vortex flow may tend to keep this region secured clear of dirt. The remaining, lower, separated flow region is fed by the underbody flow and by the side flows coming over and out of the rear wheel wells. It should be the dirtier region because it is fed by the most dirt-laden flow from the wheels and because the larger, more diffuse vortex contains lower-speed flows.

7.0 CONCLUSIONS

A wind tunnel test was performed to select the best aerodynamic configuration for a new bus - Proposal 2 with a bevelled rear end - from a set of proposed designs, and to compare this configuration to the current production MCI CJ3 and to three competitors - the Prevost H3-40, the Mercedes 0404, and the Setra S315. The new design had lower aerodynamic drag than the other buses, resulting in lower predicted power consumptions and lower fuel consumptions. The reduced fuel consumption has an obvious and strong impact on the direct operating cost of the bus while the lower required power level should result in reduced noise, increased drive line reliability, better passing acceleration, and greater drive tire life. An indication of the superior performance of the new bus is given in the following table.

PERFORMANCE COMPARISON AT 120 km/h

BUS	\overline{c}_{D}	TOTAL POWER, kw	FUEL CONSUMPTION £/100-km.
New MCI	0.349	197.8	45.3
MCI CJ3	0.606	252.8	57.9
Prevost H3-40	0.447	214.8	49.2
Mercedes 0404	0.649	260.9	59.8
Setra S315	0.694	271.4	62.2

This design is a good compromise between low drag, as shown by these tests, and ease of manufacture, according to the attending MCI engineers. It would be possible to design a lower-drag front end for this new configuration, one that might have a wind-averaged drag coefficient below 0.30, but it may require a significant change to the driving position and mirrors, as well as being a more difficult and expensive geometry to manufacture.

8.0 NOTATION

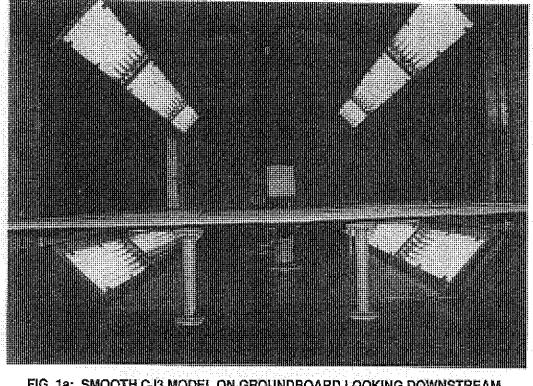
- ai rolling resistance coefficients, equation (12)
- b reference width for moment coefficients, wheelbase, 7.225 m. full scale, 0.7225 m. model scale
- CD drag coefficient, D/(1/2pV²A)
- $\overline{C}_D(V_b)$ wind averaged drag coefficient based on bus road speed, $\overline{C}_D(V_b) = \overline{D}/(1/2pV_b^2A)$
 - Q drag coefficient, L/(1/2pV2A)
 - C_M drag coefficient, M/(1/2pV²Ab)
 - CN drag coefficient, N/(1/2pV2Ab)
 - CR drag coefficient, R/(1/2pV2Ab)
 - Cs drag coefficient, S/(1/2pV²A)
 - D aerodynamic drag force, N.

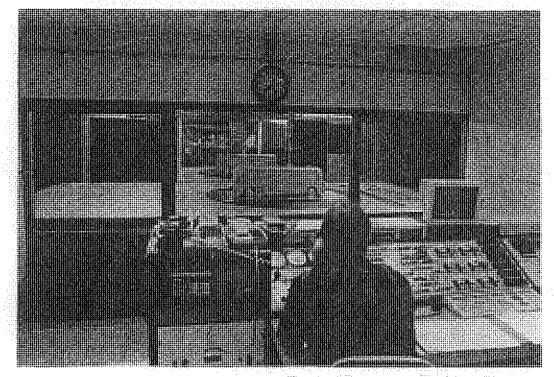
MCI - 039876

- D(V_b) wind-averaged drag, includes the effects of the 11 km/h annual hourly mean wind speed blowing with equal probability from all directions, N.
 - Dt total resistance to the forward motion of a bus due to aerodynamic drag, rolling resistance of tires, and wheel bearing losses, N.
- dC_N/dψ slope of the yawing moment coefficient versus yaw angle curve, deg.-1
- dCs/dψ slope of the side force coefficient versus yaw angle curve, deg.-1
 - M bus mass, kg.
- P(Vb) power required at the rear wheels for propulsion of the bus at speed Vb, kw.
 - Pa accessory power consumption, kw.
 - Pe engine power, Pe/n, kw.
- P_e(b) wind-averaged engine power, kw.
 - Po engine power rating, kw.
 - R rolling resistance of tires and wheel bearings, N.
 - V_b bus road speed, km/h.
 - V_f resultant air speed due to wind and bus motion, equivalent to wind tunnel test speed, equation (5), km/h.
 - V_w speed of the natural wind, km/h.
 - w reference length for Reynolds number, maximum legal vehicle width, 2.56 m.
 - x_{cp} centre of pressure of the side force vector relative to the mid-wheelbase origin of coordinates, equation (18), m.
 - p air density, 1,226 kg/m3 at S.T.P.
 - yaw angle, the angle between the direction of the resultant wind and the direction of bus motion, equation (4), deg.
 - direction of the natural wind relative to the direction of bus motion
 - η transmission efficiency
 - u bus fuel consumption, 2/100-km.
- $\overline{\mu}(V_b)$ wind-averaged bus fuel consumption, equation (16), $\ell/100$ -km.

9.0 REFERENCES

- 1. Cooper, K. R., The Wind Tunnel Simulation of Surface Vehicles.
- 2. Cooper, K. R., The Effect of Aerodynamics on the Performance and Fuel Consumption of Trucks and Buses.
- Cooper, K. R., The Effect of Front-Edge Rounding and Rear-Edge Shaping on the Aerodynamics of Bluff Vehicles in Ground Effect.
- The Wind Tunnel Testing of Buses and Trucks.
- Cooper, K. R., The Wind Tunnel Testing of Eight Commercially-Available Aerodynamic Drag Reducing Devices.





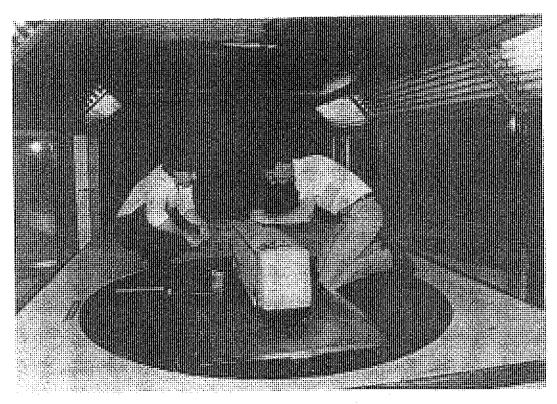


FIG. 1c: FITTING HATCHES, SMOOTH CJ3

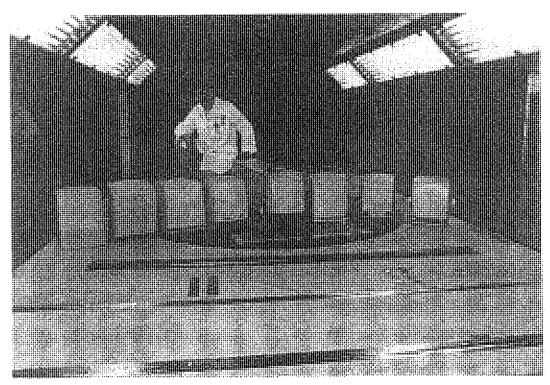


FIG. 1d: MODEL WITH ALTERNATE FRONT AND REAR COMPONENTS

(from left to right - Standard CJ3, Setra S315, Prevost H3-40, Mercedes 0404, Smooth CJ3, Proposal 1, Bevelled Rear, Proposal 2 - note suction slot just upstream of the turntable)

MCI - 039879

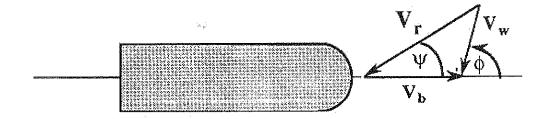


FIG. 2: RESULTANT VELOCITY VECTOR DIAGRAM

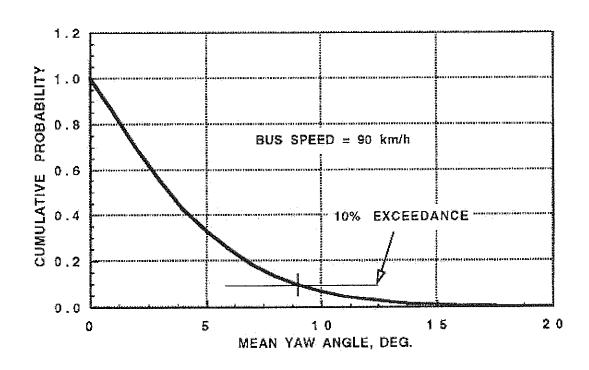


FIG. 3: PROBABILITY OF EXCEEDING A GIVEN YAW ANGLE AT A BUS SPEED OF 90 km/h

Sanger.

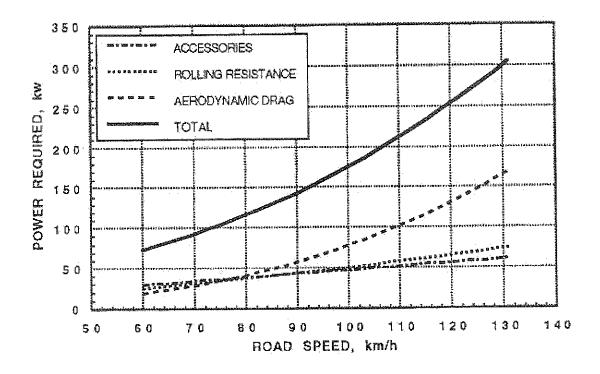


FIG. 4: POWER COMPONENTS FOR THE STANDARD CJ3

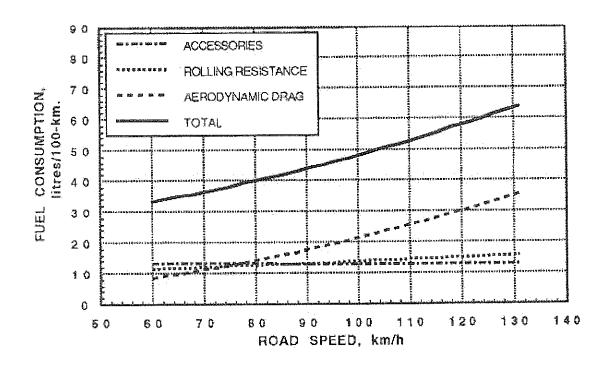


FIG. 5: COMPONENTS OF FUEL CONSUMPTION FOR THE STANDARD CJ3

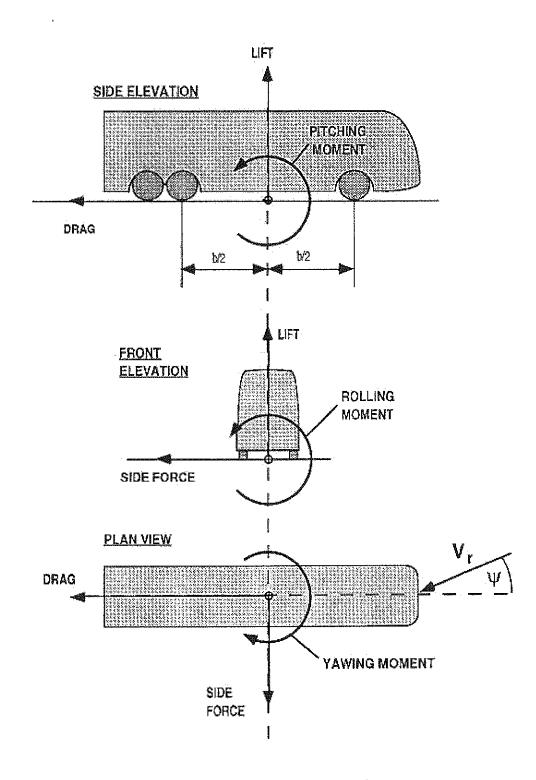
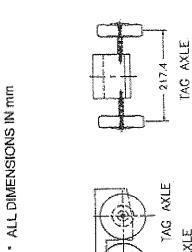
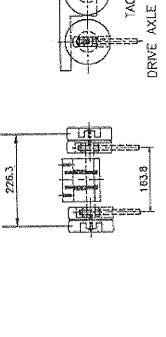
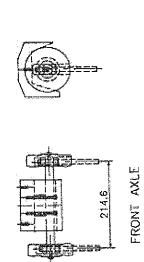


FIG. 6: MEASUREMENT CO-ORDINATE SYSTEM



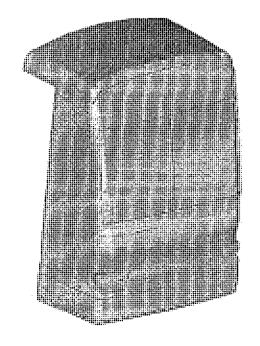




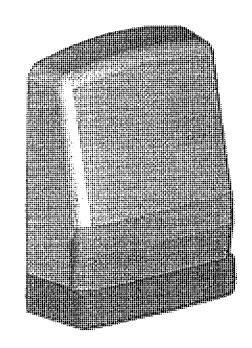
MCI - 039883

FIG. 7a: CHASSIS DETAILS

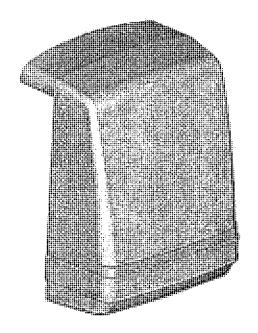
DRIVE AXLE



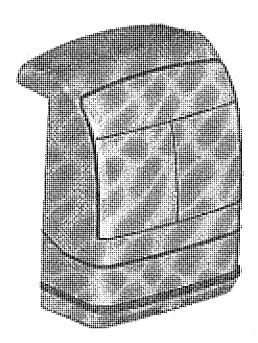
Standard MCI CJ3



Smooth MCI CJ3



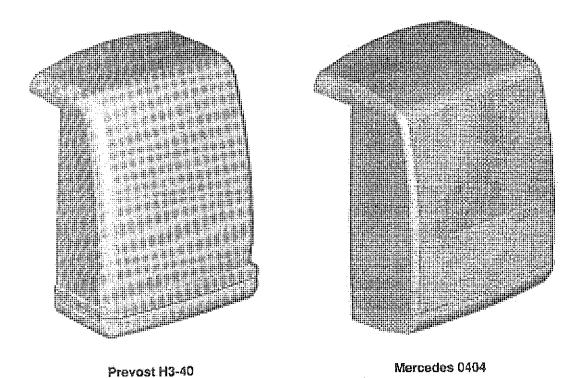
MCI Proposal 2

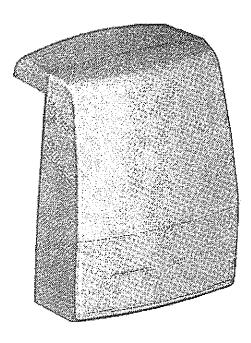


MCI Proposal 1

FIG. 7b: MCI FRONT-END CONFIGURATIONS

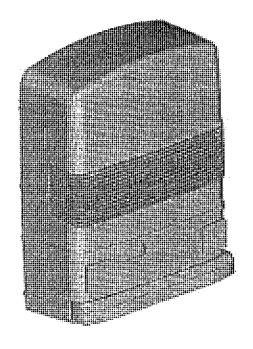




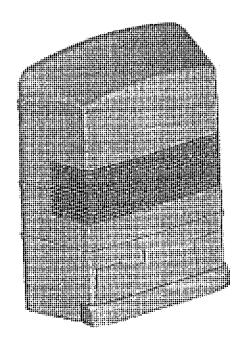


Setra S315

FIG. 7c: COMPETITORS' CONFIGURATIONS



Standard MCI CJ3



15° Beveled

FIG. 7d: REAR-END CONFIGURATIONS

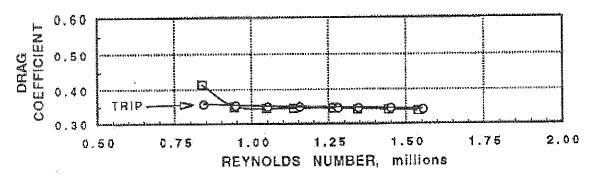
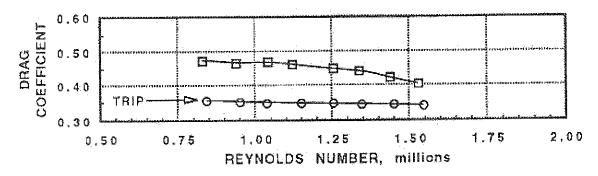


FIG. 8a: REYNOLDS NUMBER AND FLOW TRIP EFFECTS - PROPOSAL 1 FRONT



G. 8b: REYNOLDS NUMBER AND FLOW TRIP EFFECTS - PROPOSAL 2 FRONT

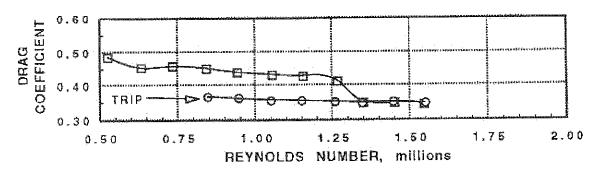


FIG. 8c: REYNOLDS NUMBER AND FLOW TRIP EFFECTS - SMOOTH C3 FRONT

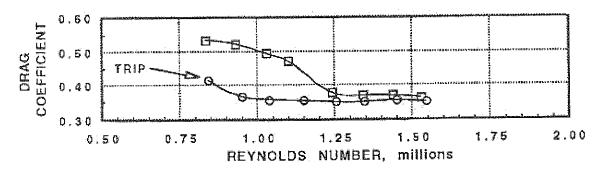


FIG. 8d: REYNOLDS NUMBER AND FLOW TRIP EFFECTS - PREVOST FRONT

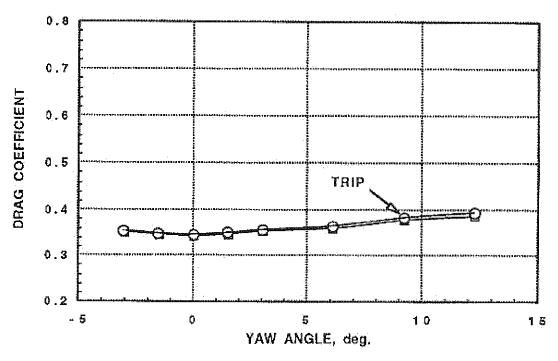


FIG. 9a: EFFECT OF FLOW TRIP - PROPOSAL 1 FRONT

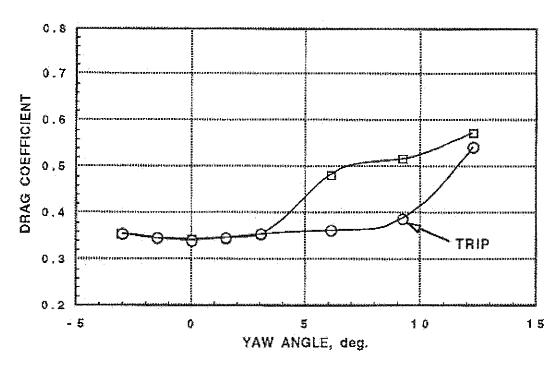


FIG. 9b: EFFECT OF FLOW TRIP - PROPOSAL 2 FRONT

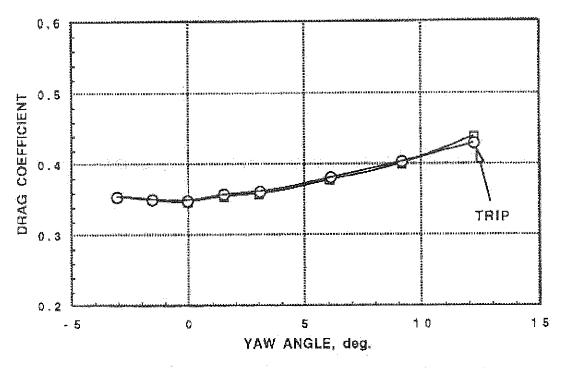


FIG. 9c: EFFECT OF FLOW TRIP - SMOOTH CJ3 FRONT.

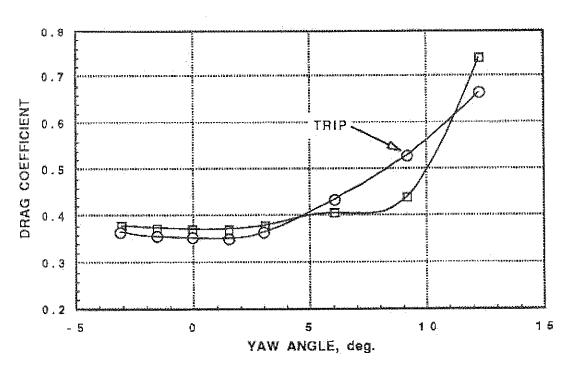


FIG. 9d: EFFECT OF FLOW TRIP - PREVOST FRONT

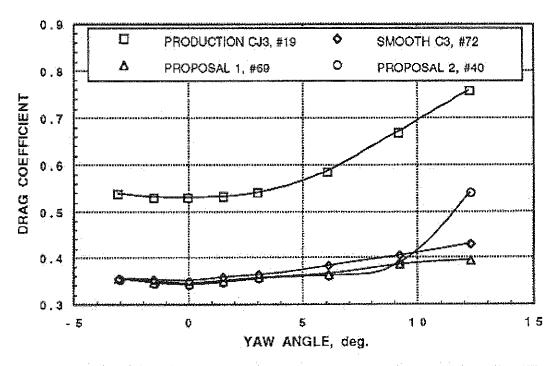


FIG. 10: COMPARISON OF FRONT END SHAPES - PRODUCTION CJ3 AND ALTERNATE PROPOSALS

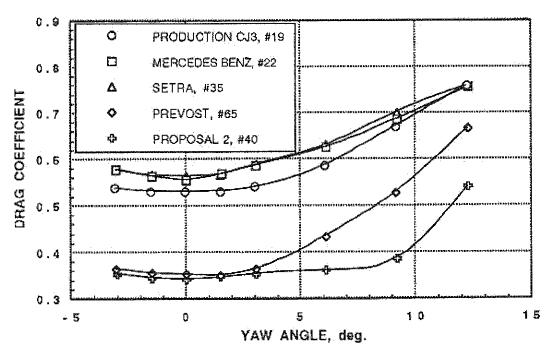


FIG. 11: COMPARISON OF FRONT END SHAPES - PRODUCTION CJ3, PROPOSAL 2, AND COMPETITORS

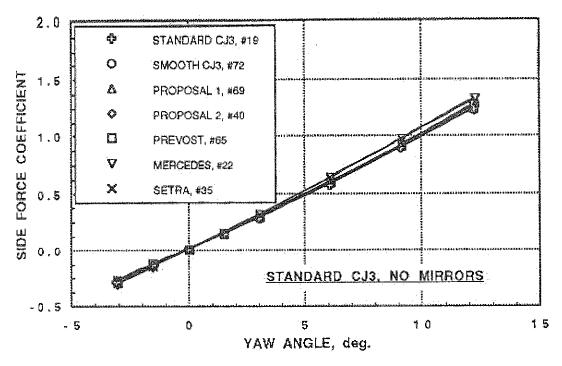


FIG. 12a: COMPARISON OF SIDE FORCE FOR THE VARIOUS FRONTS

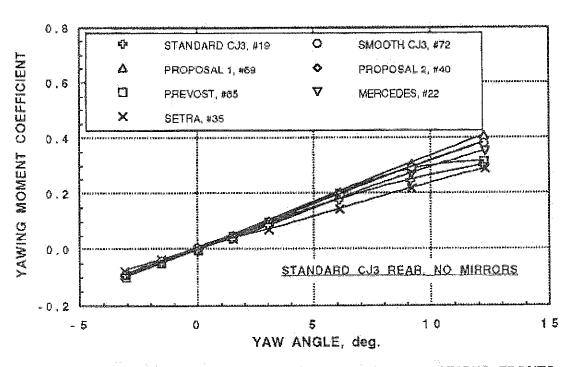


FIG. 12b: COMPARISON OF YAWING MOMENT FOR THE VARIOUS FRONTS

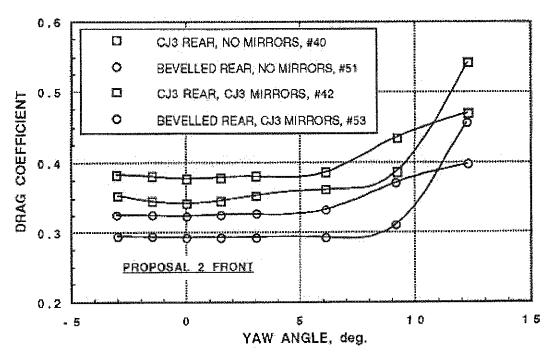


FIG. 13: COMPARISON OF BEVELLED AND STANDARD REAR ENDS WITH AND WITHOUT MIRRORS

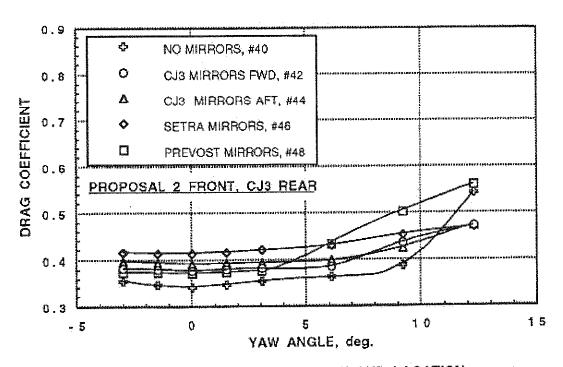


FIG. 14: EFFECT OF MIRROR TYPE AND LOCATION

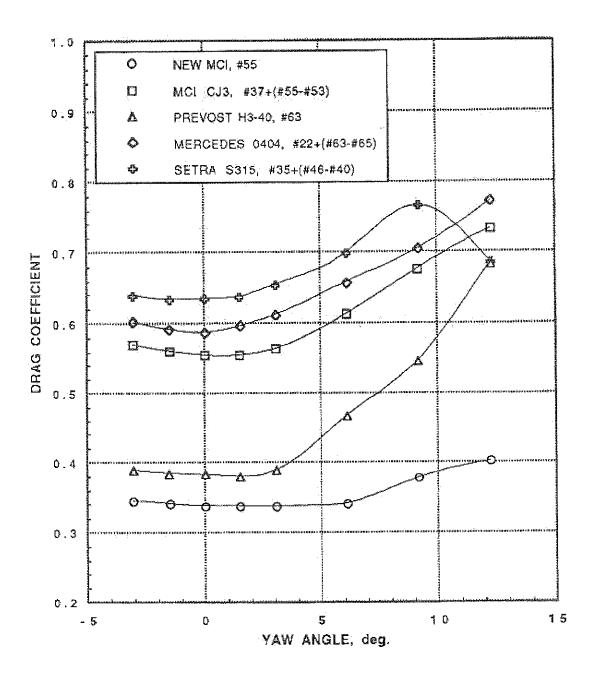


FIG. 15: DRAG COMPARISON OF MAIN CONFIGURATIONS WITH MIRRORS

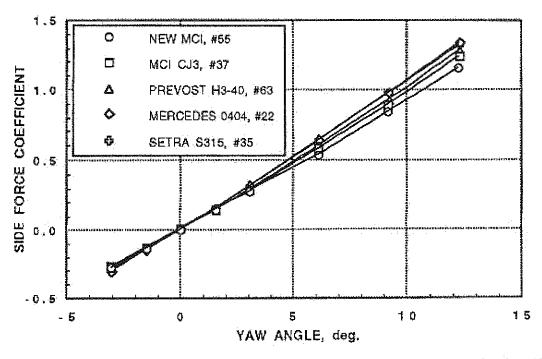


FIG. 16a: SIDE FORCE COMPARISON OF MAIN CONFIGURATIONS WITH MIRRORS

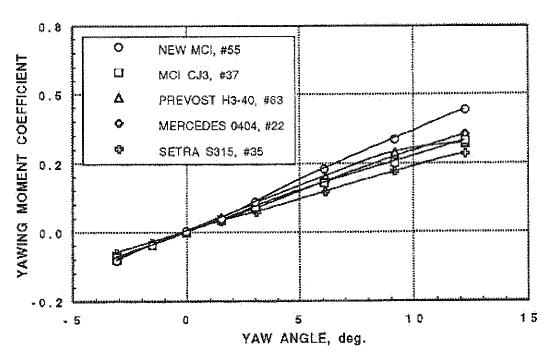
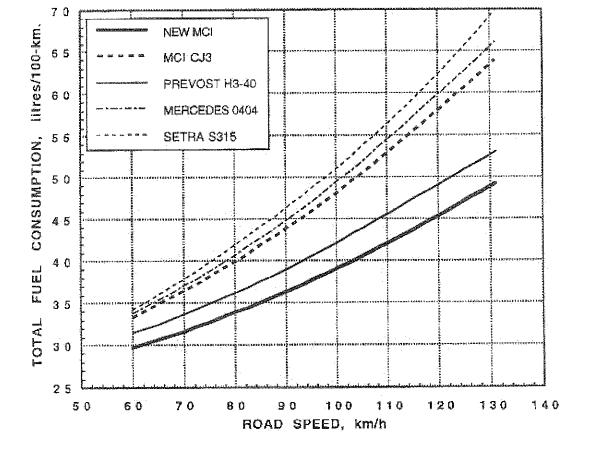


FIG. 16b: YAWING MOMENT COMPARISON OF MAIN CONFIGURATIONS
WITH MIRRORS



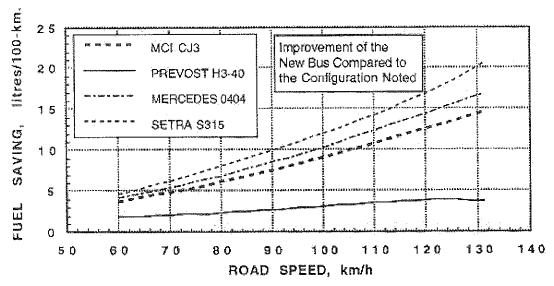


FIG. 17: SUMMARY OF THE PREDICTED FUEL CONSUMPTIONS OF THE MAIN CONFIGURATIONS AND THE SAVINGS PROVIDED BY THE NEW BUS

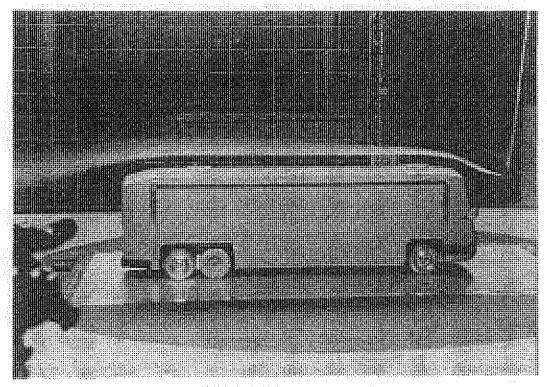


FIG. 18a: OVERALL FLOW FIELD

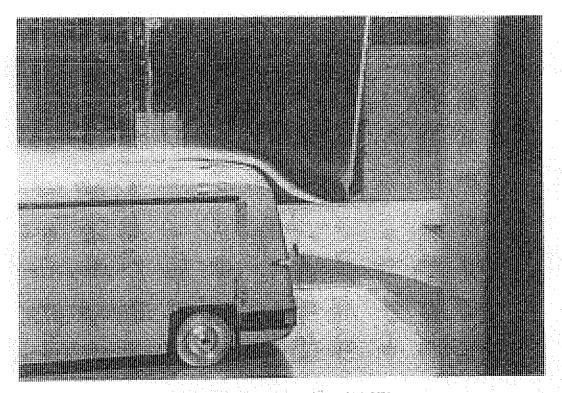


FIG. 18b: LEADING EDGE FLOW

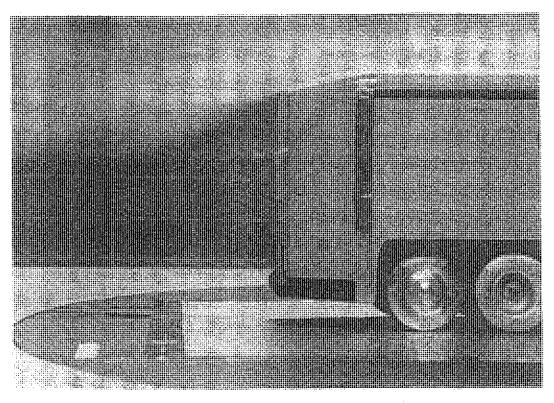


FIG. 18c: ATTACHED REAR BEVEL FLOW

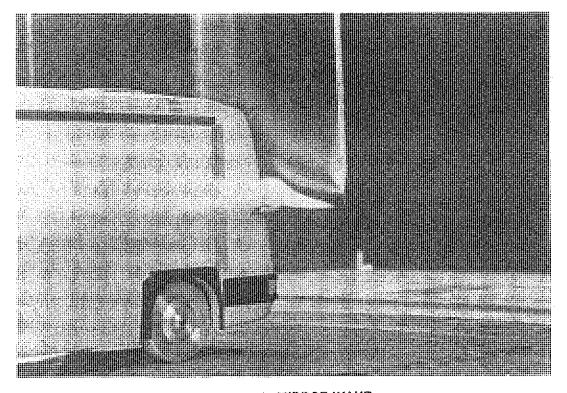


FIG. 18d: MIRROR WAKE

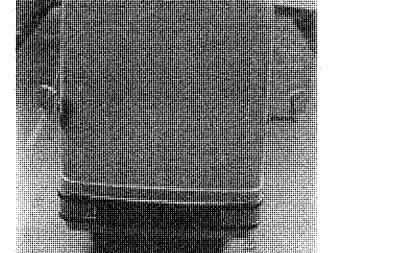


FIG. 19a: FRONT-FACE FLOW SHOWING STAGNATION POINT AT LOWER CENTRE

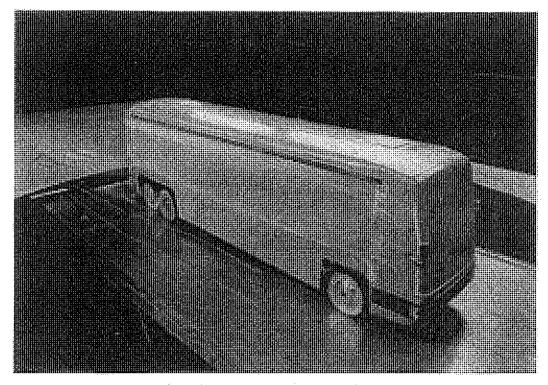


FIG. 19b: MIRROR-INDUCED FLOW



FIG. 19c: CLOSE-UP OF MIRROR-INDUCED FLOW

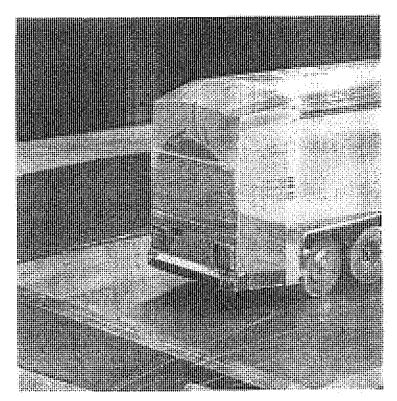


FIG. 19d: BASE FLOW

Moredo basin

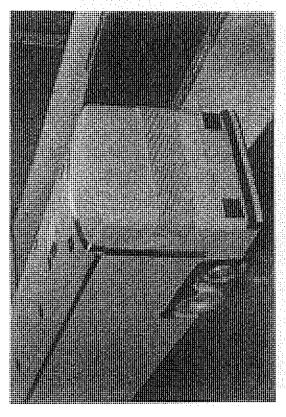
APPENDIX 1: RUN LOG

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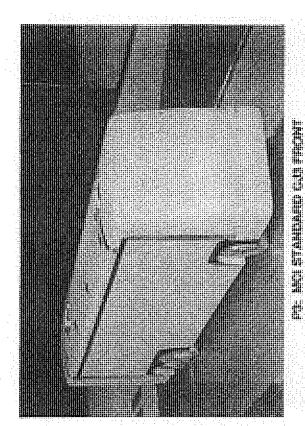
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APPENDIX 2: PHOTOGRAPHIC LOG

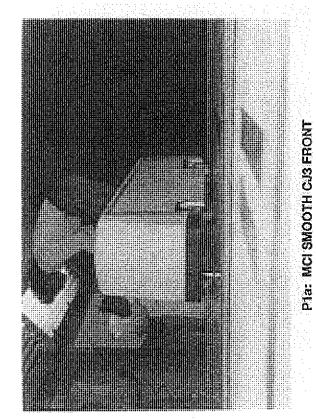
P1	MCI Smooth CJ3 Front and Standard CJ3 Rear
P2	MCI Standard Hatch and Drip Rail
P3	MCI Standard CJ3 Front
P4	Mercedes 0404 Front
P5	MCI Proposal 1 Front
P6	MCI Proposal 2 Front
P7	Prevost H3-40 Front
P8	Setra S315 Front
P9	Standard CJ3 Front with Standard CJ3 Mirrors
210	MCI Proposal 2 Front with Flow Trip
⊃11	Proposal 2 Front with Standard CJ3 Mirrors Forward
212	Proposal 2 Front with Standard CJ3 Mirrors Aft
213	Proposal 2 Front with Setra Mirrors
² 14	Proposal 2 Front with Prevost Mirrors
715	Rear End with 15° Bevels on Top and Sides
¹ 16	Proposal 2 Front with Standard CJ3 Mirrors Forward and Aft
217	Proposal 2 Front and Wheel Skirts
218	Proposal 2 Front with Air Dam
P19	Proposal 2 Front with Tire Fairings
P20	Vortex Generators Immediately Upstream of Bevelled Rear
P21	Modified Drip Rail
P22	Prevost H3=40 Front with Prevost Mirrors
P23	Prevost H3=40 Front with Flow Trip
P24	Proposal 1 Front with Flow Trip[
Doe	Smooth C.13 Front with Flow Trin



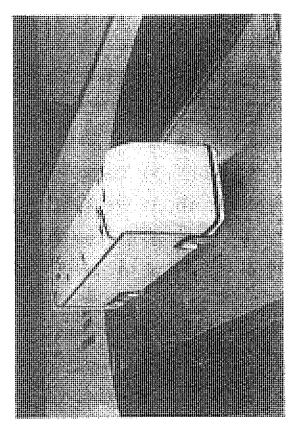
PTD: WC STANDARD CUS NEAR



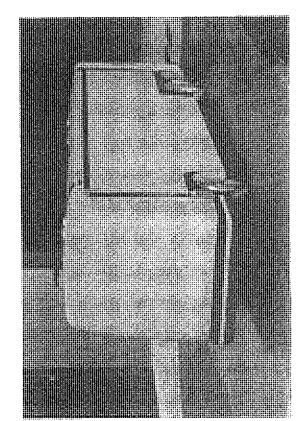
P2: MCI STANDARD HATCH & DRIP RAIL



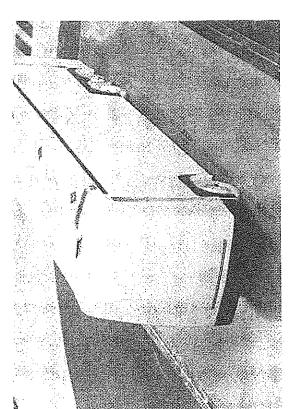
MCI - 039903



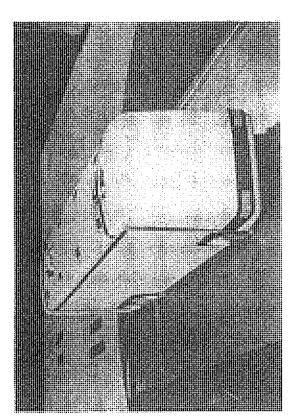
P5: MCI PROPOSAL 1 FRONT



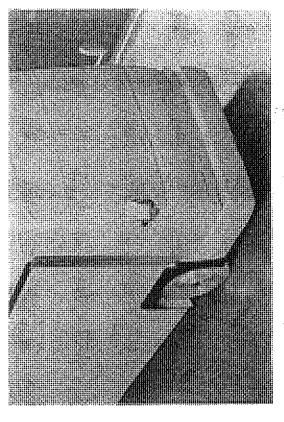
P7: PREVOST H3-40 FRONT



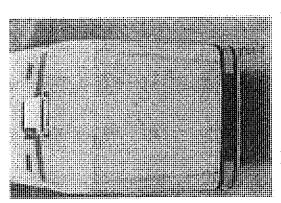
P4: MERCEDES 0404 FRONT



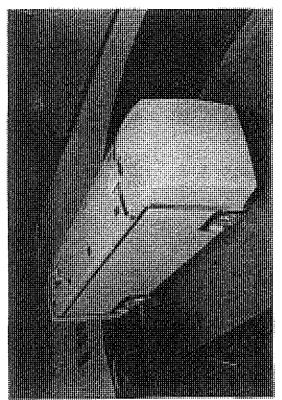
P6: MCI PROPOSAL 2 FRONT



P98: MCI STANDARD CJ3 FRONT WITH STANDARD CJ3 MIRRORS FORWARD



P10: MCI PROPOSAL 2 FRONT WITH TRIP

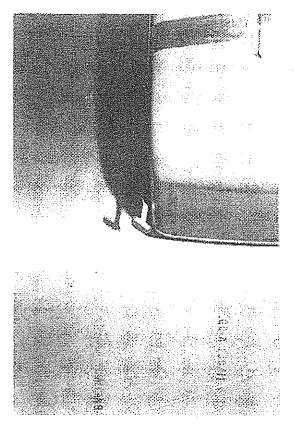


PB: SETRA S315 FRONT

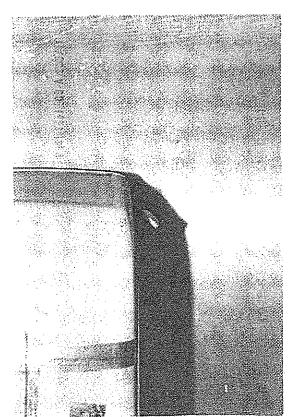


P9b: MCI STANDARD CJ3 FRONT WITH STANDARD CJ3 MIRHORS FORWARD

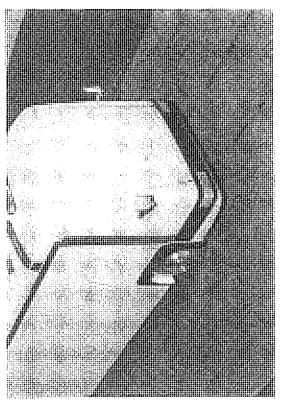
MCI - 039905



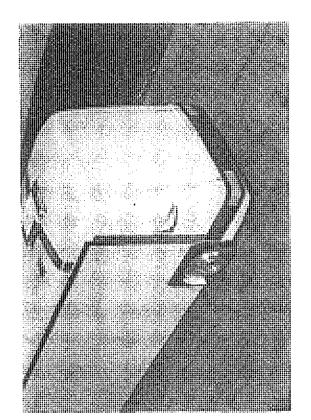
P11b: MCI PROPOSAL 2 FRONT WITH STANDARD CJ3 MIRROR FORWARD



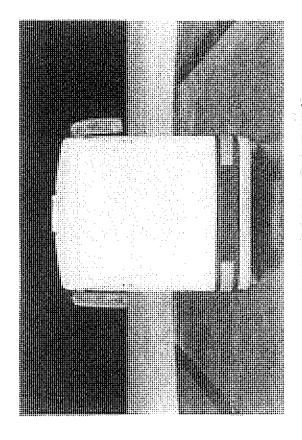
P12b: MCI PROPOSAL 2 FRONT WITH STANDARD CJ3 MIRROR AFT



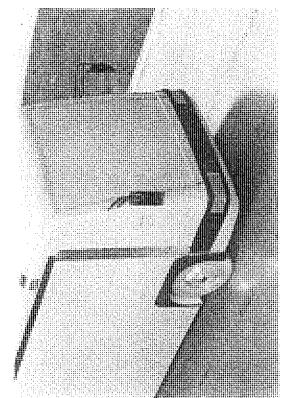
P11a: MCI PROPOSAL 2 FRONT WITH STANDARD CJ3 MIRRORS FORWARD



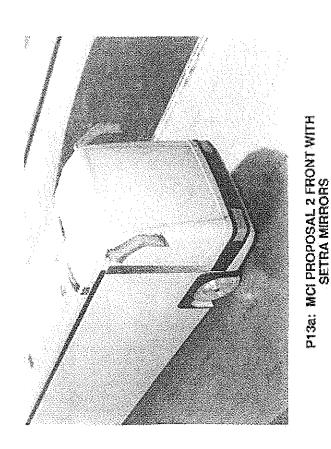
P12a: MCI PROPOSAL 2 FRONT WITH STANDARD CJ3 MIRRORS AFT

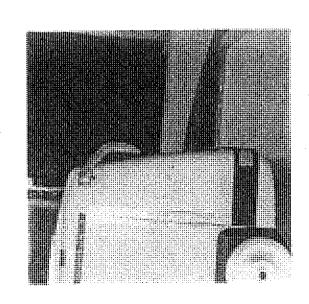


P13b: MCI PROPOSAL 2 FRONT WITH SETRA MIRRORS



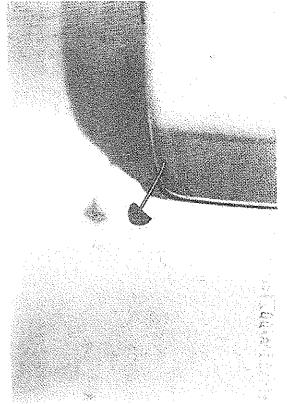
P14a: MCI PROPOSAL 2 FRONT WITH PREVOST MIRRORS



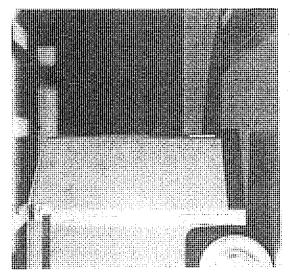


P13c: MCI PROPOSAL 2 FRONT WITH SETRA MIRRORS

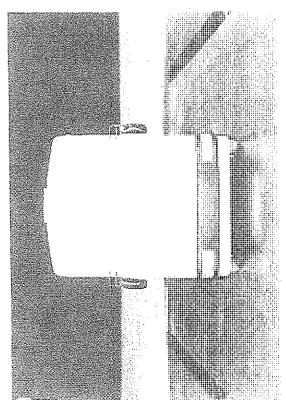
MCI - 039907



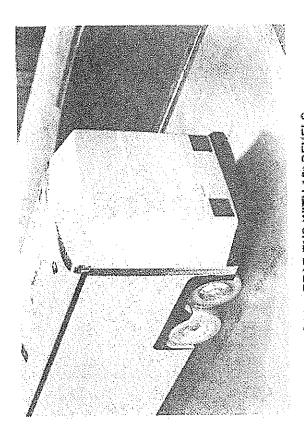
P14c: MCI PROPOSAL 2 FRONT WITH PREVOST MIRROR



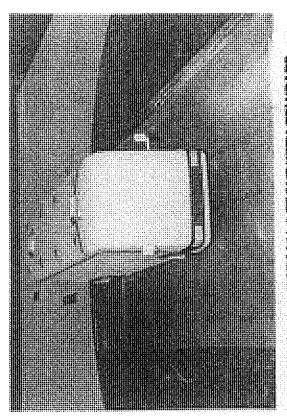
P15b: REAR END WITH 15° BEVEL ON TOP EDGE



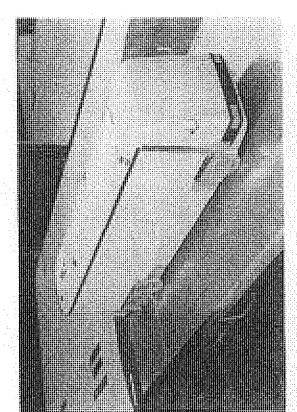
P14b: MCI PROPOSAL 2 FRONT WITH PREVOST MIRHOR



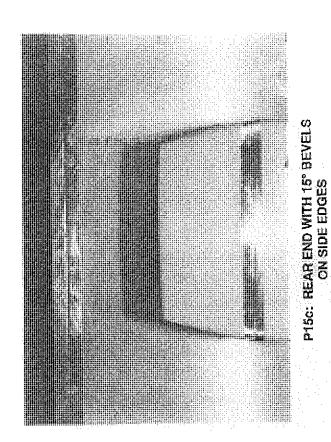
P15a: REAR END WITH 15° BEVELS ON TOP AND SIDE EDGES



PISE WCI PROPOSAL 2 FIICHT WITH STANDARD
CLS MITHORS FORWARD AND AFT



P17: MC PROPERTAL & FIRMMI AND WHEEL SKIRTS

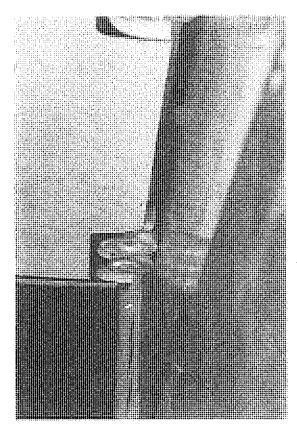


P16b: MCI PROPOSAL 2 FRONT WITH STANDARD CJ3 MIRRORS FORWARD AND AFT

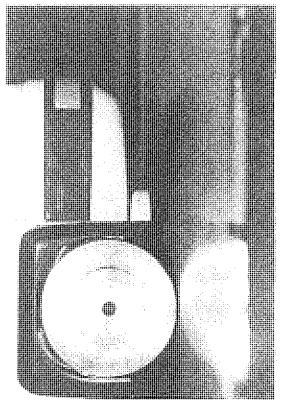
MCI - 039909



P18b: MCI PROPOSAL 2 FRONT WITH AIR DAM



P19b: MCI PROPOSAL 2 FRONT WITH REAR-TIRE FAIRING

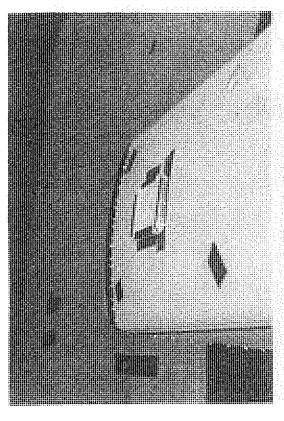


P18a: MCI PROPOSAL 2 FRONT WITH AIR DAM

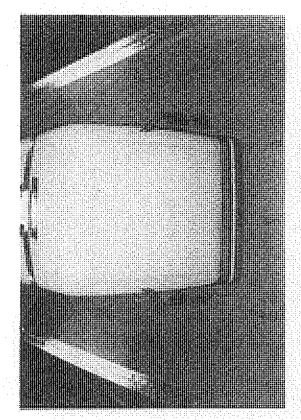


P19a: MCI PROPOSAL 2 FRONT WITH FRONT-TIRE FAIRING

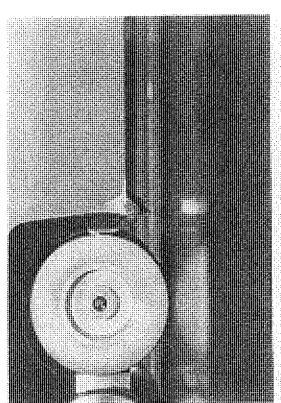
MCI - 039910



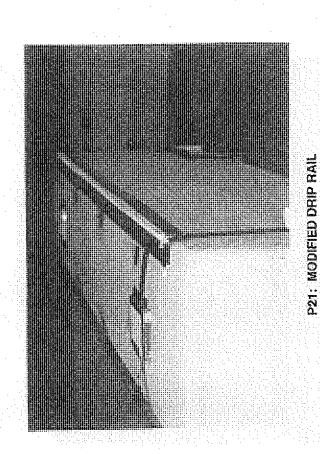
P20: VORTEX GENERATORS IMMEDIATELY UPSTREAM OF BEVELLED REAR



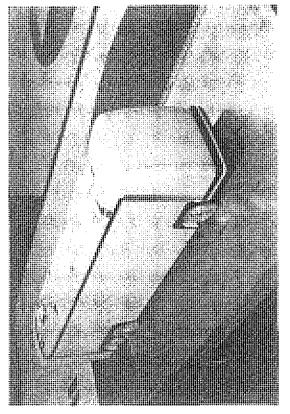
P22a: PREVOST H3-40 FRONT WITH PREVOST MIRRORS



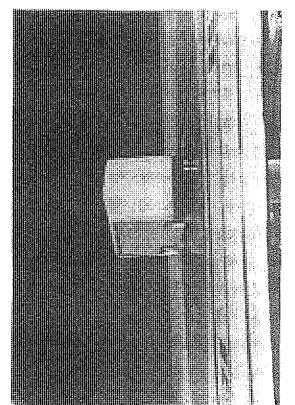
PID: RESETTING FAITING



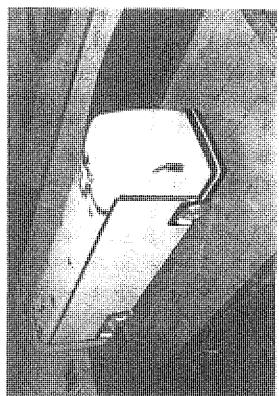
MCI - 039911



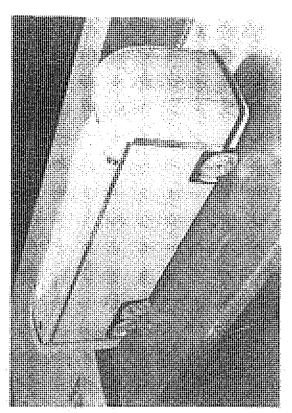
P23: PREVOST H3-40 FRONT WITH TRIP



P25: MCI SMOOTH CJ3 FRONT WITH TRIP



P22b: PREVOST H3-40 FRONT WITH PREVOST MIRRORS



P24: MCI PROPOSAL 1 FRONT WITH TRIP

APPENDIX 3: DATA TABULATION

The following notation is used in the tabulations:

Rept/Tare/Run = Test number/Run no. for wind-off balance zero readings/Run no.

QC = reference dynamic pressure corrected for wall effects

Re = Reynolds number

PT = point number

VEL = test wind speed based on QC

CL = lift coefficient
CD = drag coefficient

CY = side force coefficient

CM = pitching moment coefficientCN = yawing moment coefficientCR = rolling moment coefficient

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			٠ ف	\$\$\$\$\$\$\$\$\$\$ ###########################	<u>.</u>				T d	000000000 4000000000000000000000000000	
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6667/012/013		= 1.166 Kp/m3 3.50 Kpa	3		g	0607/015/016		¢¢≈ 1.183 Kg/m3 4.22 Kpa	8	-0, 0951 0, 0060 0, 0000 0, 0454 0, 1987 0, 3898 0, 3898	Q
吊きなもどできずまど用なお	REAR	Denej ty= GC= 3.	X D	200000000 0000000000000000000000000000	\$\\ \alpha \\ \a	Hept/Tare/Run	REAS	Density gts gts	E D	0.0015 0.0011 0.00480 0.00480 0.00480 0.00480 0.00772	Averaged 0. 409 0. 387 0. 377 0. 371
Rept	STANDARD	.08 c 0.08359 m2 66 Million	<u>ئ</u>	-0.2570 -0.1139 -0.1139 -0.1330 -0.3030 -0.4187 -0.4187 -1.2581	A	A DEF	STANDARD R	s C Obisto me Militan	ئ د	0.2713 0.1243 0.1243 0.1263 0.2639 0.9641 1.2432	5 5 5
	8	の 単む 本 II 数	9	0,3527 0,3473 0,3481 0,3581 0,3861 0,4037 0,4496			8	TEMP# 24,48 (Ref Areas D. Of He 1.4083 M	¢.	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
	C3 SHDDIR FROWT.	KPA TEMPE 5 m Ref Ar Res 1	ជុំ	00000000000000000000000000000000000000	% pered (m) / h >		C3 SMGOTH FRONT,	KPA TEMP≈ Sa Refa	ટ	0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000	7 6 6 8 6 8 6 8 6 8 6 8 6 8 6 8 6 8 6 8
TEST		PRESS= 101, 2 P 1#rgth=0,722\$	A G B D S			1531		PRESS= 101.1 langth=0.722	YAW (dep)	다	य के वि
BUS		ATM PRESS= Ref 1829th	VEL (#/\$)	កាល់ប្រាស់ ស្នេច ស្ន ស្នាល់ ស្នេច ស្នេច ស្ន		eve. T		ATM PRES Ref lang	VEL Ca/s>	ស្នាធាធាធាធាធាធាធាធាធាធាធាធាធាធាធាធាធាធាធ	
			<u>-</u>	000000000 44446000					F	200000000000000000000000000000000000000	

120/6		E e / 5	5	0.000 0.000		4/025		£#/6	CR	-0.0068	
120/020/2090		Rensity= 1.199 Kg/m3 QC= 1.47 Kpa	N O	0.0001 0.0001 0.0001 0.0015 0.0001 0.0001	. 5	060770247025		Denzityw 1.189 Kg/m3 Oc= 1,47 Kpä	S S	0,000 0 0,000 0 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0 0,000 0 0 0 0 0 0 0 0 0 0 0 0	5
Rep\$/fare/Aun) REAR	Density OC=	Æ.	0.1667 0.1506 0.1503 0.1563 0.1563 0.1468 0.1468	A	Rept/Tanc/Run	REAR	Denaity GC=	Ŗ	0,09939 0,0766 0,0700 0,0700 0,0700 0,0700 0,0700	84 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
F. 42	STANDARD	: 3050 mg 111:0n	>	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	3	A age	STANDARD	; 3358 mਵੇ 11110n	ຮ້	0.0138 0.0158 0.0145 0.0113 0.0031 0.0031	pui m
	FRONT, CO	21.69 C Arram 0.09359 Wi 0.8424 Million	ទ	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			FRONT, CO	= 23,99 C Area = 0.08338 mi 0,8335 Million	ដូ	QQQQQQQQQ 4 0000000000000000000000000000	
	MERCEUES REMI	TENE Roll Res	ರ	0.050 0.050	9 e e d (m) (h) 35, 00 45, 00 55, 00 75, 00		PROPOSAL #1	4PA YEHP m Ref Res	CL	0.0691 0.0691 0.0691 0.0691 0.0691 0.0694 0.0944 0.0944	40 00 00 00 00 00 00 00 00 00 00 00 00 0
10 10 10 10 10 10 10 10 10 10 10 10 10 1	系	88688-101.5 kea 1471th: 2.7225 a	የአሜሪ (ፈጥቧ)	6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	S S In	TEST	Œ	PREBG# 101, 5	YAM	######################################	Bus
aus 1		ATM PRESS= Ref length:	95% \$#6/93	ବ୍ୟୁକ୍ତ		576		ATM PRES Rof Long	URL (m/s)	40440 444 40440 444 40440 444 40440 444	
			} G.	20000000000000000000000000000000000000					i-	200000000 10000000000000000000000000000	
2/284		g /m3	85	0.0044 0.0044 0.0044 0.1376 0.2316 0.2316		1,023		/43	80	.0.0055 -0.004 -0.004 -	
94077.0177.059		= 1,173 Kg/m3 4,18 Kse	Z S	-0.0927 -0.0936 -0.0392 0.0392 0.1271 0.2478	g.	050770207023		- 1, 178 kg/a3 1, 16 kga	č	0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000	ถว
Rept/Taro/Run	D 88AR	Densitys 95-	Ş	0. 0719 0. 0823 0. 0834 0. 0777 0. 0855 0. 0855 0. 0850	A/ 0.00000000000000000000000000000000000	Rept/Tare/Run	3 REAR	Density= GC= 4.	Ē	0.000 0.1400 0.1400 0.1600 0.1600 0.1600 0.1600 0.1600 0.1600	Averaged O. 605 O. 643 O. 606 O. 606 O. 696
Hep t	CZ STANDARD	C 83733 #7	Å	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	े हैं ट क क	Rept	3 STANDARD	4 C .08350 m2 Million	Շ	0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000	M. in S.
		Pr 27,09 C Arear 0,08458 m 1,3847 Hillion	מט ַ	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			FRONT, CO	TEMP= 26.74 C Ref Ares= 0.08350 Re= 1.3870 Hilli	G D	0 5788 0 5684 0 5684 0 5684 0 5873 0 5853 0 7542	
	PROBUCTERN CO FROME.	7. P.	ಕ	0.0044 0.0044 0.0047 0.0047 0.0047 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048 0.0048	25 000 000 000 000 000 000 000 000 000 0		MERCEDES DENZ		C.	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	35.00 35.00 45.00 55.00 55.00 75.00
155	2086	PRESS 101.1 MPA length-6,3223 m	۲۳% ۱۶۵۶)	ა ელადატამ ალაი 4001 ალაი 4001 ალი 6000	ይ ጠታው ማ ቦ ያ ያ ያ	51,	MERIC	ATM PRESS= 105.5 KPA Ref length=0.7225 m	94W (6eg)	20.10 20.10 20.20 20.10	200 4 8 20 8 70 8 70 8 70 8 70 8 70 8 70 8 70
1831 849		ATM PRESS	VEL <π/45}	គ្នា មក្សា ក្នុង ក្ន		aus test		ATM PRESS	VEL (#/5)	១១១៤៤៤ ១១១៤៤៤ ១៩៩៩១៩១៧ ១៩៩១១២	

BUS TEST PROPOSAL 82 ERONT, C2 ETAMENAD DEAM	2 4 0 E	PT VEL YAU CL. CD CY CM CN CR	01 49, 6 -0.02 -0.0482 0.4733 0.0146 0.1207 -0.0006 -0.0051 02 55.9 -0.02 -0.0469 0.4459 0.0143 0.1167 -0.0002 -0.0051 03 62.4 -0.02 -0.0451 0.4499 0.0143 0.1163 -0.0011 -0.0033 04 772 -0.02 -0.025 0.4473 0.0153 0.1140 -0.0007 -0.0025 05 81, 2 -0.02 -0.025 0.4473 0.0139 0.1133 0.0006 -0.0017 06 81, 2 -0.02 -0.025 0.4430 0.0139 0.1134 0.0002 -0.0016 07 87.8 -0.02 -0.025 0.4430 0.0139 0.1134 0.0002 -0.0016 08 87.8 -0.02 -0.025 0.4430 0.0139 0.1134 0.0002 -0.0016 09 93.9 -0.02 -0.0428 0.4046 0.0098 0.1083 0.0018 -0.0018	30's speed (mi/i) Wind Averaged CD 35', 60' 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000	RUS TEST Rept/Tare/Run 0607/030/031	PREVOST FRUNT, CO STANDARD REAR	ATM PRESS= 101 5 KPA TEMP= 35.33 C Density= 1.184 Kg/m3 Ref length=0.7223 m Ref Area= 0.05355 m2 QC* 1.47 Kpa Re= 0.8308 Million	PT VEL YAU CL CD CY CM CR (m/s) (4rg)	01 49.4 -0.01	8us speedfaira: Hind Averaged CD 35.00 0 0.000 45.00 0.000 55.00 0.000 75.00 0.000
80% TEST PROFOGA. #1 FROMT, CO STANDARD REAR	AIM PRESS-101.5 KPA TEMP+ 29.00 C Density= 1.170 kg/m3 Ref length=0.7225 m Ref Area 0.08338 mg QC= 4.24 Kps Ref 1.3860 Million	PT VEL YAW CL CD CY CM CN CR (m/s) (deg)	01 B9,1 -3.04 0.0012 0.3504 -0.2794 0.0593 -0.0932 -0.0675 02 B9,1 -1.53 -0.0400 0.3441 -0.1322 0.0725 -0.0484 -0.0367 04 B4,9 -0.01 -0.0449 0.3441 -0.1322 0.0725 0.0019 -0.0367 04 B4,9 -0.0107 0.3534 0.3021 0.0518 0.0812 05 B4,7 4.11 0.1092 0.3534 0.3021 0.0450 0.1027 0.0451 07 B4,0 9.17 0.3299 0.3778 0.9144 0.0447 0.3070 0.2111 08 B3,6 12.26 0.4026 0.3872 1.2580 0.0316 0.4102 0.2897	Bus speedint/hi Mind Averaged CD 45.00 0.363 0.371 45.00 0.371 45.00 0.359 0.359 0.359 0.356 75.00 0.356	aus Test Rept/Tore/Aun 0607/027/027	PROPOSAL #2 FRONT, C3 STANDARS REAR	ATM PRESS 101.3 KPA TEMPA 29,48 C Densibyr 1.168 My/m3 Ref lengthac.7225 m Ref Arear C.08358 m2 GC 4.23 Ka Ref 1.3779 Million	PT VEL YAW. CL CD CY CM CN GR (m/s) (deg)	01 84.9 -3.03 0.0190 0.3543 -0.2835 0.0751 -0.0350 -0.0470 02 86.9 -1.53 -0.0187 0.3467 -0.1346 0.0845 -0.0479 -0.0373 03 84.8 -0.02 -0.0210 0.3423 0.001 0.0845 -0.0473 -0.0373 04 84.7 1.51 -0.0210 0.3423 0.001 0.0845 -0.0023 -0.0037 05 85.1 3.05 0.0287 0.3522 0.3057 0.0774 0.0473 0.0271 07 84.0 0.1374 0.4833 0.4148 0.0972 0.0973 0.2212 08 83.1 12.26 0.4498 0.5750 1.3851 0.0818 0.3901 0.3057	Dus spred(mi/h) Wind Averaged CD 35.00 0.496 0.456 0.456 0.456 0.436 0.436 0.436 0.436 0.436 0.436 0.436 0.436

0/034		C = / 6	N O	-0.0069 -0.0069 -0.0068 -0.0068 -0.0068 -0.0068 -0.0068		25079		5 m Z	ยั	0.000000000000000000000000000000000000	
06.07/033/0334		ա 1. 184 Kg/m3 1. 40 Kp.a	Z Ç	0, 0010 0, 0022 0, 0031 0, 0031 0, 0031 0, 0018 0, 0018	9	0607/036/037	REAR	4, 18 Kp/m3 4, 18 Kpa	Z S	0.000000000000000000000000000000000000	ŭ G
Rept/Zare/Run	:AR	Sersitaya Oca	ş	0,1202 0,1153 0,1153 0,1154 0,1154 0,1177 0,1177	Avertages 0, 000 0, 000 0, 000 0, 000 0, 000 0, 000	Rept/Tere/for	STANDARD I	Densitys GCs 4,	X	0. 0731 0. 0810 0. 0839 0. 0774 0. 0728 0. 0731 0. 0731 0. 0870	Averaged 0.461 0.521 0.521 0.531 0.531
A A	STANDARD AEAR	5 C 000%8 m2 Miliipm	γ.	0.000 0.000	Pugm	Rept	g g	6 8348 = 2 111100	Ġ.	-0, 22 fg	A City S
	g	25 45 17 46 37 D	g D	0, 971 0, 971 0, 969 0, 966 0,			FRONT WITH MIRRORS,	2= 27,76 C Areas 0.08355 E [.3837 Million	£	0.000 0.000	
	SETRA FRONT.	KPA YEMP A Kef (A Res	70	20 0678 -0.0578 -0.0583 -0.0583 -0.0584	90cad (mi/h) 955.00 45.00 55.00 55.00 75.00		3	KPA TEMPE 7 & Ref Ar Rem 1	દ	-6,0512 -6,0630 -6,0630 -6,0543 -6,0783 -6,8310 -6,8310 -6,8310 -6,8310 -6,8310	speed (mi/h) 35,00 45,00 55,00 75,00
TEST		PRESS= (01, 5 KPA jengtem0, 7225 m	(608)	သို့ မို့ မို့ မို့ မို့ မို့ မို့ မို့ မ	ය. ජ ධ සු	1667	PACEUCTEON	28655= 101.5 H length=0.7225	YAM (deg)	4140409 440409 4408 44109 4410 4410	20 20 20 20
BY YE		ATM PAR	VEL (3/3)	ဝေကလတက္ကရာ ဝဏ်လွယ်လွန်ဝန်လို တက်ဆောက်ထာတာက		пов 1		ATM PRES Ref leng	VE1. (m/s)	លាច្នេះជួយបានគេក្នុ ក្នុងប៉ុស្តិក្សុសុំ ឧ	
			ā.	00000000 10000000000000000000000000000					g.	000000000	
57632		97 m 3	CH	-0.0648 -0.0033 0.0016 0.0017 0.0657 0.1382 0.3116		37025		g 6 ca.2	E C	0.00742 -0.00747 -0.00747 0.00744 0.1588 0.2463 0.1583	
960770507632		кут 1 166 Кg/m3 4.22 Крл	5	-0,0433 -0,0433 -0,0633 0,1028 0,2016 0,2795 0,2795	0	0667/633/025		= 1.166 My/m3 4.80 Kpa	3	-0.0759 -0.0379 -0.0393 -0.0393 -0.1448 -0.1448	a ₃
Rap t/Tare/Aun	878	Density General	ŗ. X	0 0169 0 0284 0 0288 0 0288 0 0192 0 0192 0 0163 0 0163	Averaged 5.501.00.501.00.00.00.00.00.00.00.00.00.00.00.00.0	Rept/Tare/Run	AR	Density GC=	E U	0,1087 0,1160 0,1160 0,1209 0,1160 0,1006 0,1006 0,1009 0,1009	Averaged 0.692 0.691 0.691 0.610 0.610
5 9	STANDARD REAR	5 8358 oZ 1111∮an	č	0000 0000 0000 0000 0000 0000 0000 0000 0000	ال غرب ال	Rept	C3 STANDARD REAR	C 183358 m2 1831601	ò	-0.1276 -0.1376 -0.0083 0.1605 0.2188 0.5283 0.73737	Hind
	0	темя= 29,90 с Ref Arca= 0 08338 m2 Re= 1.3776 Mll1fan	8	0.3902 0.3745 0.3716 0.3721 0.3797 0.4091 0.4091				TEMP= 29.99 C Ref Area= 0.08338 mZ Re= 1.3402 Million	CD	0, 5768 0, 5540 0, 5538 0, 5680 0, 5680 0, 7010 0, 7010	
	PREVOST FRONT.	∀ 45 €	3.0	0.0495 0.0013 0.0013 0.0017 0.0017 0.0017 0.0017 0.0017 0.0017 0.0017	peed (#1/h) 45,00 45,00 65,00 75,00		SETRA FRONT	£	_{ខំ}	0,000 -0,030 -0,0468 -0,0468 -0,0469 0,1569 0,3411	69 464 (74) 35. 40 45. 00 45. 00 72. 00
TEGT		PMESS= (01.5 F length=0.7225	(Ger:	0.11.0 0.11.0 0.10.0 0.0	## 5- 50.	TESY		PRESS= 101.5 KP. 1ergita-0.7225 m	YAL (483)	6412504664 841250464	영 상 유
SOO		Alm Poss Rof 180	(소/포) 기품산	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		ន្ធ <u>ា</u>		AÎM PRE Ref 182	VE(. (a/s)	田 田 田 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日 日	
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\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		Çφ/m3.	ង	0.0026 0.0026 0.0026 0.0026 0.0026 0.0026 0.0026			37044	\$m/#	S,	0,000 0 0,000 0,000 0,000 0,000 0,000 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
\$\$07.00007.£030 ×		# 1,173 Kg/m3 4,20 Kpa	¥.	-0.0929 0.0929 0.0007 0.0476 0.2913 0.2913	0		060770437044	Johnstein NEAH Densitys 1, 174 Kg/m3 GCs 4, 28 Kps	¥	0,000 0,000 0,000 0,000 0,000 0,191 0,191 0,000 0 0,000 0 0,000 0	· 6
Rock/Tare/Rus	BYANDARD REAR	Denist tym Gom	E.	0.0759 0.0861 0.0864 0.0904 0.0610 0.0673 0.0683	A 222 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	į		Density Government	X Ü	0,0830 0,0915 0,0915 0,0928 0,0826 0,0649 0,0618	AVATANA O A 438 O A 438 O A 609 O A 609 O A 609
5. 5.	63	C)8358 m2 1111490	Ş	0. 18823 0. 0094 0. 0094 0. 0094 0. 0094 1. 2784 1. 2781	25.25	ć			ò	-0.2840 -0.1367 0.0107 0.1615 0.4038 0.7127 1.2307	7 7
	FROM WITH CRIT,	16/8 = 27,8; C Ref Area 0,08358 m2 Re* 1.3862 Millian	ġ	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0			Cambowa Pro Per	87. 12 90. 12 90. 17	g	0,000 a 000	
	74	MPA TEPE T Ref	ชี	0,0194 -0,0190 -0,0126 -0,0126 -0,0247 -0,1333 -0,1861 -0,466	Peed (mi/h) 45, cd 45, co 55, co 65, co 75, co		FROM! WITH CRIT AND	KPA TELON	밁	0.000 0.000 0.000 0.000 0.000 0.000 0.2517	25.00 45.00 55.00 75.00 75.00
aus Test	PROP	Press (01, 0 x length=0.7225	YA# (dep)	44474494 24222527	e first big is	TEST	2 FROM? I	PAESS JÓI. 3 Ki iength#0, 7225 a	VAW (deg)	646-16-9-44 846-16-9-44 846-16-44	3. 14. 24. 24. 24. 24. 24. 24. 24. 24. 24. 2
570		ATA PRE Ref. 1988	VEC.	3 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5		1871 318		ATM PAR Res ion	VEL (8/\$)	四四四四四四四 外外 水水 水水 水 克 多 多 多 多 多 多 多 多 多 多 多 多 多 多 多 多 多 多 多	
			i.	0000000					14	000000000000000000000000000000000000000	
90/038		ලක / නි	C.R.	0.0088 0.0088 0.0088 0.0088 0.0088 0.0090 0.0090		250/5		Sei / 6)	£	-0, 0491 -0, 0386 -0, 0052 0, 0582 0, 0565 0, 1361 0, 2456	
\$60/000/2090		43 tyw 1, 190 Ag/m3 1, 49 Kpa	3	0,000,000,000,000,000,000,000,000,000,	୍ଷ	060770417042		= 1, 173 Kg/p3 4,21 Kpa	ž	-0.0948 -0.0468 -0.0468 -0.0458 0.6958 0.1940 0.2945	ලි
Rept/Tare/Aum	STANDARD REAR	ው∉ሰቴ ፤ ኒų ዌር≃	.E	0.0871 0.0840 0.0833 0.0833 0.0833 0.0833 0.0833 0.0853	Averaged 0, 000 0, 000 0, 000 0, 000 0, 000	Rep t/Tare/Run	STANDARD REAR	######################################	5	0. 0837 0. 0650 0. 0650 0. 0650 0. 0650 0. 0650 0. 0650	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$
Rept	S	C 8338 A2 311691	} ₀	4 4 4 6 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	10 mg/s/24	Rep	ņ	6 8358 m2 11116n	Å3	-0, 2655 0, 0067 0, 1373 0, 3047 0, 9210 1, 2650	No 花 Seri
	FADM WITH GRIT.	TEMP* 23,51 C Ref Area 0.08338 AZ Rem 0.8399 Million	20	00000000000000000000000000000000000000			CO MIRRORS FWD,	12MPm 27,59 C Ref Aream 0.08359 m2 Rem 1.3885 Million	co	0.02816 0.03489 0.03489 0.03489 0.0350 0.45080 0.45080 0.45080	
	F		占	10,0041 10,0041 10,0041 10,0041 10,0041 10,0041 10,0041 10,0041	8844681783 35.00 45.00 65.00 65.00 75.00				75	0.0202 0.0249 0.0249 0.0260 0.1386 0.2565 0.4430	\$\$ eed (mi/h) US. OO A\$. OO S\$. OO S\$. OO S\$. OO
řest	P ROP	ath Press 101, 4 kpa Ref lengther 7224 a	(549) MVA	ଞ୍ଚିତ୍ର ପ୍ରତ୍ତିକ ବ୍ରତ୍ତିକ୍ତିକ୍ତିକ	B 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	aus Test	FRORT WITH CRIT AND	ATM PRESS= 101, 3 KPA Ref length=6, X225 m	(529) Mys	64.00.29.55 40.00.29.55 10.00.25 10.00.	# # # # # # # # #
BUS YEST		ATK PRE Ref 1en	(\$/\$) (#/\$}	50,0 66,0 66,0 67,0 68,0 68,0 68,0 68,0 68,0 68,0 68,0 68		303	e.	ATM PRE Ref len	(\$/#) 320	000 000 000 000 000 000 000 000 000 00	
			ŗ.	00000000000000000000000000000000000000			dÜNd		n,	2988888	

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0607/047/048	ላRD <u>ያ</u> ፎላቸ	1. 174 kg/69 26 Kpo	***	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	a o	060770497051		j≂ 1,163 Kg/m3 4,28 Kpa	Z U	0,000 0 0,000 0,000 0,000 0,000 0,000 0,000 0 0,000 0 0 0 0 0 0 0 0 0 0	<u>ය</u> ප
Reg t/Tare/Run	C3 STANDARD	Density≕ GC≃ ≜,	ស្វ	0.000000000000000000000000000000000000	Averaged 0. 4694 0. 446 0. 446 0. 197 0. 197	Rept/Tate/Run	R 15	Densitus GCH +	£	-0,0554 -0,0508 -0,0447 -0,0541 -0,0641 -0,0693	Average 0. 347 0. 353 0. 254 0. 275 0. 275
N S S	MIRRORS,	1 C CGOSB AZ Militon	δ	10, 384, 384, 384, 384, 384, 384, 384, 384	5.00 mg/s	Rept	GRIT, REAR	7 C OBJSB MR Million	ð	-0.27% e -0.1469	i. A
	D PAEVOST	27.00 .0.00 .0383	20	0,000 0 0,000 0 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0,000 0 0,000 0,000 0 0,000 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			нттн	9.00 9.00 0.00 0.00 0.00 0.00 0.00 0.00	6	0, 2933 0, 2933 0, 2933 0, 2931 0, 2934 0, 2934 0, 4872 0, 4872	
	FROMT WITH CRIT AND PREVOST	T to the second	궁	0.0827 -0.0340 -0.0279 -0.0176 0.1291 0.1291 0.2610	peed (mi/h) 35.00 45.00 45.00 55.00 75.00		PROP 2 FRONT	F- C- C- fr o or L- r l	ಕ	0,1866 1866 1866 1866 1866 1866 1866 1866	45.00 55.00 55.00 55.00 55.00 75.00
rest	(A	25 101, 3 KPA theo, 7225 a	.(deb).	신청학교교육단년 20월 20일 20일 20일 20일 20일 20일 20일 20일 20일 20일 20일 20일 20일	80 80 80 80 80 80 80 80 80 80 80 80 80 8	TEST		PRESS= 101, 9 KPA length=0, 7225 m	Kabs Value	24.00 4.00 4.00 4.00 4.00 4.00 4.00 4.00	स ७ १
SS	PROP	ATM PRESSE Ref length	15/w)	យកមក្សក្នុយ ប្រើប្រើប្រើប្រឹក្សិ ប្រាយពីពិធីពិធីពិធី		T SUS		AĭM PRES Ref leng	VEL (#/5)	ចាចច្ចាធាធាធាធាធា ស្រស់ស្រួស្រួស់ (១០១៤៤/ 24	
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37046		×0 (43)	Š	0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.0000		050/1		(7m3)	8	10.00043 10.00043 10.00043 10.0043 10.0043 10.0043 10.0043 10.0043	
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<u>युं</u> 6:8 12	HERRORS.	C 8358 m2 11110n	Ö	-0.2689 -0.1322 0.0129 0.0129 0.3164 0.4169 0.9288 1.3653	E I I	Resp	REAR	c 3358 m3 1111en	ò	0,00038 0,00038 0,00042 0,00044 0,0003 0,0000 0,0000	A Carrier of the Carr
	AND CETAR	TEMP= 27.45 C Ref area= 0.08358 m2 Re= 1.3757 Million	0 3	0.000 000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.			NY LEITH G	TEMF* 26.02 C Ref Area 0.08358 M Ref 0.8607 Million	60	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
	FRONT WITH ORIT AND CETAR		ਹੁੰ	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	FP ee (lai /h) 45.00 55.00 75.00 75.00		PROP'Z FRONT WITH GRIT.	€	ರೆ	0, 1551 0, 1550 0, 1500 0, 1500 0, 1500 0, 1500 0, 1500 0, 1500	54 (55) 14 5 56, 65 56, 65 55, 60 55, 60 55, 60 57, 60 57, 60
m cp	-	PRESS= 101.0 KPA leagen=0.7225 m	WAY Wash	510-19-9-9-9-9-9-9-9-9-9-9-9-9-9-9-9-9-9-	2 2 2 4	183		PRESS= 101.3 KPA length=0.7225 m	MAY (QAb)	\$	5. 10 50 51
20°	dObd	ATM PRES Ref lemg	VEC (α/ε)	ក្នុង ទី		DVG TEST	· •	ATM PRESS= Ref lengsh	.VEL: (π/s:}	ស្នួនភ្លេក ពីទីក្ ប៉ុស្តែក ស្ត្រីក្ ទុងឯកសំសួងឯ	
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4/035	7. 2.	`~	S E	0.0453 0.0294 0.0294 0.0394 0.1189 0.2444 0.2444		\$4/058	REAR 1	Em/6	S	-0.0414 -0.0414 -0.0017 -0.0841 -0.1841 -0.2407	
0607/054/035	AFI), REAR	23.1	NO.	0.0044 0.00476 0.00476 0.0080 0.1086 0.3363 0.3363	3	850/989/686/028	AIR DAM	а 1, 180 Ку/мд 4. 18 Кра	Š	-0.1070 -0.0566 -0.0031 0.1073 0.2192 0.2261 0.4165	g
Rept/Tare/Rum	FWD. LEFY A	Density. Gom	r	0.0378 -0.0386 -0.0386 -0.0384 -0.0443 -0.0443 -0.0531	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Rep t/Tare/Run	AFT), VERTICAL	Deneitty: OC= 4,	5	-0.0339 -0.0359 -0.0359 -0.0342 -0.0544 -0.0534	Avertaged 0. 400 0. 406 0. 090 0. 084 0. 084
Rept	(RIGHT	COBSES SA	Շ	0,00000 0,00000 0,00000 0,00000 0,00000 1,00000 1,00000 1,000000	M. Yand	Rept		် ဝဗ်ဒန် နှည် Million	ξ	-0.00000000000000000000000000000000000	1. D
	amd co mirredro	TEMP= 25,62 Ref Aream 0,0 Re= 1,4037 M	ĝ	0.3443 0.3443 0.3366 0.3371 0.3371 0.0371 0.0478			ICHT PUD.	TEMP# 25,64 (Ref Aream C. Of	Ó	0,000,000,000,000,000,000,000,000,000,	
	WITH GRIT AND C	ζΡ.Α B	j j	0, 1849 0, 1866 0, 1826 0, 1425 0, 2793 0, 4272	Deed (mi/h) 38.00 45.00 45.00 45.00 75.00		CO MIRKONS (RIGHT PUD, LEFT		ដុំ	0.0969 0.0887 0.1026 0.1140 0.2159 0.3118 0.4418	500 (ML/h) 35, 00 45, 00 55, 00 55, 00 75, 00 75, 00
ies.	FRONT WITH	PAES\$≈ 101, 2 langth≈0, 7228	YAW (deg)	646999999 92829574	9 2 2 3	TESY	CH LT,	PRESS= 101,2 KPA longth=0.7225 m	YAH (6eg)	64-10-46-49-91 58-99-99-91 58-99-99-91 58-99-99-91 58-99-99-91	S. F S S
SOE	PRDP 2 F	भौत त्रमहरू स्हर्गा विष्	VEL (m/\$)	៣០០០២៦៣២ ឧក្ភុក្ភុក្ភុក្កុក ភេទសភភភពទស		1008 TESY	2 FRONT,	ATH PRES Ref len	いれた (m/s)	ಞನ್⊣ ಆಗಗಾತ್ರ ಶಿಶ್ಚಿಕಿತಿಕೆ ಮೆಸು ಅದರಾಪ್ತಿಯಿಂದ	
			FØ	0000000 100000000000000000000000000000			PRCS		F	00000000 10000000000000000000000000000	
527053		ig/m3	ቻ	70, D653 -0, 6463 -0, 6043 0, 6239 0, 6211 0, 1216 0, 2568		57057	REAR 15	y /m3	#	0.0652 0.0652 0.0348 0.0348 0.1269 0.1269 0.1697 0.2661	
466770527053	6	ty≈ 1.170 Kg/m3 4.22 Kpa	S	-0,0967 -0,0610 -0,0070 0,0337 0,1134 0,2339 0,3427 0,4479	8	0607/096/057	Fairings. Rear	= 1,160 Kg/m3 4,23 Kpa	₹	-0, 10B7 -0, 0486 -0, 06886 0, 1089 0, 1089 0, 2880 0, 2880	នី
Rep t/Tare/Run	FWD, REAR	Density QC=	£	0.00 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Average 6 991 6 991 6 9 9 9 9 9 9 9 9 9 9 9 9 9	Rept/%are/Run	_	Densieu QCm	P	10,0414 10,0444 10,0420 10,0421 10,0384 10,0384	4 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
Rep 4	MIRRORS	C 36348 m2 11114en	<u>ک</u>	0.14734 0.14734 0.1631 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000	¥ing	Rept	MIRRORS (RIOSI FUD.LEFT AFT), WHEE	C 8338 m2 111100	<u>ک</u>	-0.2725 -0.1402 -0.0250 -0.1656 -0.3760 -0.3760 -0.3760 -0.3760	H, nd
	MA TIN	1= 28.12 c Areae O.06348 m2 1.3863 Milliton	Ç	45.000000000000000000000000000000000000			RICHI FUD	*= 25.43 ¢ Area 0.08358 m2 1.4041 Hillion	Q _D	0,000,000,000,000,000,000,000,000,000,	
	FRONT WITH GRIT AND	KPA TEMP	ુ	0, 1922 0, 1554 0, 1545 0, 1546 0, 1767 0, 1770 0, 6083	75. 00 55. 00 55. 00 55. 00 55. 00 75. 00			KPA YEMPH In Ref Ari Rew 1	ಭ	0,2068 0,1849 0,1761 0,2829 0,2864 0,4514 0,589	25,00 45,00 45,00 55,00 55,00 55,00 75,00
TEST	PROP 2 FRE	101. 2 ~0. 7225	YAW (600)	ပ မရှင်းရမှနေရီ မရှင်းမှနေရှင်း မရှင်းမြောင်းရင်း	면 호 고	1037	, GRIT, C3	ATM PRESS» 101. 2 K Ref lengthmo.7225	(6ab)	4 4 6 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	# # # # # # # # # # # # # # # # # # #
. \$0.8		Aîm Press Ref length	VEL (n/s)	#####################################		1 She	2 PRONT.	ATM PRES Ref leng	√8C. (a /s)	ប្រាស្តេស្តាយជា កុំសុំសុំសុំសុំខុំកូំប៉ ≻កស្កិស្តិស្តិ	
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090/	REAN 15	.ew/	E U	0.0633 0.		7,063		/m3	5	-0, 0690 -0, 00388 -0, 0038 0, 06374 0, 1409 0, 2208 0, 2103	
080770567060	GEN.	1, 177 Kg/m3 1, 31, Kpa	ž	-0, 1028 0,0040 0,0034 0,1088 0,1088 0,0098 0,0098	0		STD REAR	= 1.176 Kg/m3 4.29 Kpa	ð	0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000	6 v
Rupt/~ass/Rum	AFT S. REAR VORTEX	Bonastop Oca 4,	Č.	0.0469 0.0400 0.0383 0.0383 0.0447 0.0584 0.0584	Average 6, 0,000 0,000 0,000 0,000 0,000 0,000	Rept/Täre/Aun	IP RATLS,	Denzity.	E U	0.0193 0.0289 0.0314 0.0373 0.0439 0.0439	Average 0, 537 0, 474 0, 442 0, 413 1, 413
Rupt	ii. Sai	1988 mil	Ċ	-6, 2743 -6, 6001 -6, 6001 0, 1457 0, 2771 0, 6056 1, 1475	<u>ه</u> د ب	i de pi	RS, STD DR	t 18356 m2 11jijan	}3	-0, 2750 -0, 1305 -0, 1305 0, 1521 0, 1521 0, 2727 0, 9274 1, 2856	# 6.11
	ATCHT FAC	TEMPS 26, 27, C Ref Areis 6, Otios MA Res 1, 4104 MELLION	8	0.000000000000000000000000000000000000			PREVOST MIRBORS, STD DRIP	Ref Area 0, 020 C Ref Area 0, 08358 m Re= 1,4079 Million	₿:	0.000000000000000000000000000000000000	
	D SHRROWS CRICHT FWD.	\$ &	ರ	0,121,1465 0,1465 0,1465 0,1465 0,1465 0,0341 0,6601	59 64 (m) /h) 65 66 66 66 66 66 66 66 66 66 66 66 66		ORIT.	45 c	ಕ	0. 4094	59994(m1/h) 098.00 45.00 55.00 55.00 78.00
14 15 14 14	r. 411. 3	Passon (al. 2) Length (d. 7225	1445 10445	6 4 6 4 9 4 8 8 8 4 6 4 8 8 5 7 6 8 4 6 4 8 8 7 7 8	हें इ. इ.	SUS TERM	THOUSE ENDINE	PRESS 101. 2 /	754X	Packag=226	터 구 스
or Pa	- 2 Mathair.	are pas Ref les	VEL.	ម្នាក់ ក្នុង ក ភាព ក្នុង ក្នុ		508	PAR	Det Per	(Colors	សស្តស្តស់ក្នុង ស្តស់សំពុំក្នុង ស្តស្តស់ក្នុង	
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0607/056/059	FAIRINGS.	1. 172 Kg/mg	5	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	8.	040770567061	13 PA	137 Kpa	õ	6. 1020 6.0017 6.0017 6.1057 6.327 6.327 6.3331 6.419	ė.
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20 46 20 20 20 20 20 20 20 20 20 20 20 20 20			ដ	0.000 0.000	II K	S. C.	esita i desta de	6 6 6 6 7 7 8 8 8 8 8 8 8 8 8 8 8 8 8 8	S. S.	0. 2936 0. 1547 0. 1923 0. 1923 0. 2993 0. 2673 1. 2673	19. 19. 19.
	ner FWD.	TEMPs 25 42 C Ref Area: D. 00250 Res 1, 4300 Ms113	42	00000000000000000000000000000000000000			o test est	12MP= 26.31 C Ref Aream 0.09328 AZ	5 6	00000000000000000000000000000000000000	
	ANTICAL ANTERS REGIONIN LA		: :	0.116697 0.116697 0.116697 0.11698 0.11698 0.11698 0.11698 0.11698 0.11698	38 of Chi / h / s / h / h			r r	را چ	00000000000000000000000000000000000000	50 c c c (d k / h) 35 00 45 00 55 00 55 00 78 00
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* 5 LL 5 FR	- kaccu	Ξ.		្តី ជាក្សាលាក្សាក្សា និស្សាស់សំសំសំសំសំ និស្សាស់សំសំសំសំសំសំ និស្សាស់សំសំសំសំសំសំ		ř	-	PHOP 2 FAO AIM PRE RPf leb	J.	្នំ	
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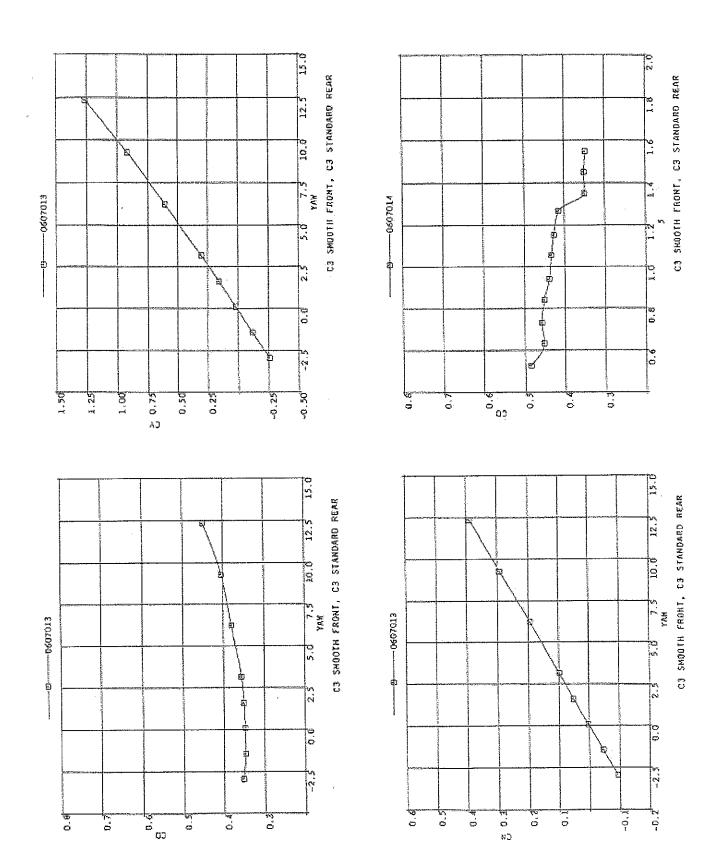
47046		Ka/mu	€	-0,0055 -0,0055 -0,0007 0,0007 -0,0013 -0,0026 -0,0026		77049		1,03	5	46,000 00 00 00 00 00 00 00 00 00 00 00 00	
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除电弧 化水芹油的四叉降级的	S. STO REAR		ž	0.0250 0.0250 0.0250 0.0201 0.0201 0.0201 0.0201 0.0201	Average 4 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Rep\$/Tare/Run	CO STO REAR	Density* GC= 6.	Ë	0, 04,18 0, 0499 0, 0707 0, 07,18 0, 05,18 0, 05,02 0, 0376	AVertaged 0. ues 0. a76 0. a64 0. a64
o. ±	a	ն 18330 թ. 111110n	Շ	0,0109 0,0214 0,0224 0,0428 0,0126 0,0128	A	43 E E	IP RAILS.	100 mm m	ò	0.000 0.000	
	III. STD ORIP	YEMP≈ 24,05 € Ref Area= 0,08358 m2 Ref 0.6312 Million	6	4.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0			t, Sto Daip	12mps 27,37 C Ref Areas O. 08358 m Res 1.3766 Million	as	00000000000000000000000000000000000000	
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rest	PREVOS	PNESS= 101. 2) length=0.7245	YALF .	######################################	W SS CR	*E53	PRGP #1	ATM PRESS* 101. 5 MPA Rof length=0.7225 m	Yati (Ses)	요 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	о. Н Н
SUS		ATH PRE Pef let	VEL (8/8)	2.45.45.45.45.45.45.45.45.45.45.45.45.45.		5 16		ATM PAU Rof len	VEL (2/5)	######################################	
			Ā	36000000 300000) C,	26268488	
4/065		(a)	5	-0.0656 -0.0058 -0.0028 0.0588 0.0583 0.0583 0.01997		7706B		£1613	£	0.0033 0.0037 0.0037 0.0037 0.0037 0.0037 0.0037	
06077064/065	E	= 1, 189 Ng/aJ 4, a7 Kpa	S	0.0936 0.0916 0.0916 0.2006 0.2003 0.2003 0.2003	g	8907/091/090	HE AR	= 1, 196 Kg/a3 1, 48 Kpa	≵	0, 0034 0, 0034 0, 0048 0, 0048 0, 0048 0, 0033 0, 0033	<u> </u>
Reșt∕Täre/Aun	h STO REAR	ወቀላኝ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ ነ	5	0.0184 0.0201 0.0201 0.0300 0.0310 0.0311 0.0350	Ave. 4 416 Q. 416 Q. 416 Q. 939 Q. 930 Q. 93	Regt/Tare/Aun	C3 STD R	Destait ya Aca	2	0.0789 0.0789 0.0720 0.0720 0.0744 0.0734	Averaged 0.000 0.000 0.000 0.000 0.000 0.000 0.000
A S	DRIP WAILS	C 8338 #2 Hiller	Շ	-0.2675 -0.1237 -0.1328 -0.2967 -0.2967 -0.9231 -1.2860	° इ	Rept	IIP RAILS,	c 20358 m2 1111on	5	0.00.00.00.00.00.00.00.00.00.00.00.00.0	P = 3
	i F	TEMP* 23,26 C Ref Arcam 0.08358 a2 Re* 1.4247 Million	9	00000000000000000000000000000000000000			T, STO DRIP	TEN∮™ 22,26 C Ref Area™ 0,08358 mi Re≕ 0.6420 Million	CO	00000000 00000000 00000000 0000000 00000	
	PACUDGE PHONT, CRIT.		ī	0.0533 -0.0533 -0.0543 -0.05647 -0.05647 -0.17519 -0.17519	Speed (m1/h) 35,00 45,00 55,00 75,00		#1 FRONT, GRIT,		ีย	0.0712 0.0714 0.0000 0.0000 0.0000 0.0000 0.0000	\$\$ eed (mi/h) 99, 90 49, 00 59, 00 59, 00 75, 00
YEST	GUENE.	atm presse 101, 2 kpa Rof 164gbb-0, 7125 m	YAH (deg)	4-0-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4	5 5 6	TEST	PROP #	ath Press 101, 5 kpa Ref lengthur 7225 m	YAW (deb)	00000000000000000000000000000000000000	* n
I SUR		ath Pres Rof 1en	VEL (m/s)	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$		ഒറല		ATM PRE	VEL (#/#)	នល់ក្នុងបញ្ជាប់ ភ្លៃស្នីឲ្យប៉ុន្តិ ក្រុមស្ដេល២១៤	
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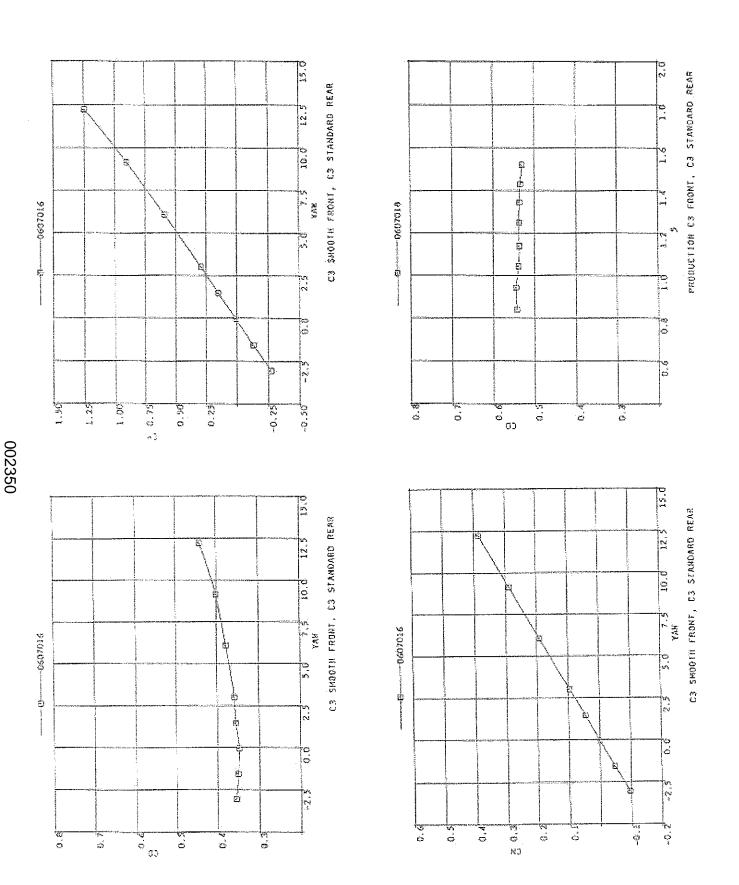
APPENDIX 4: DATA PLOTS

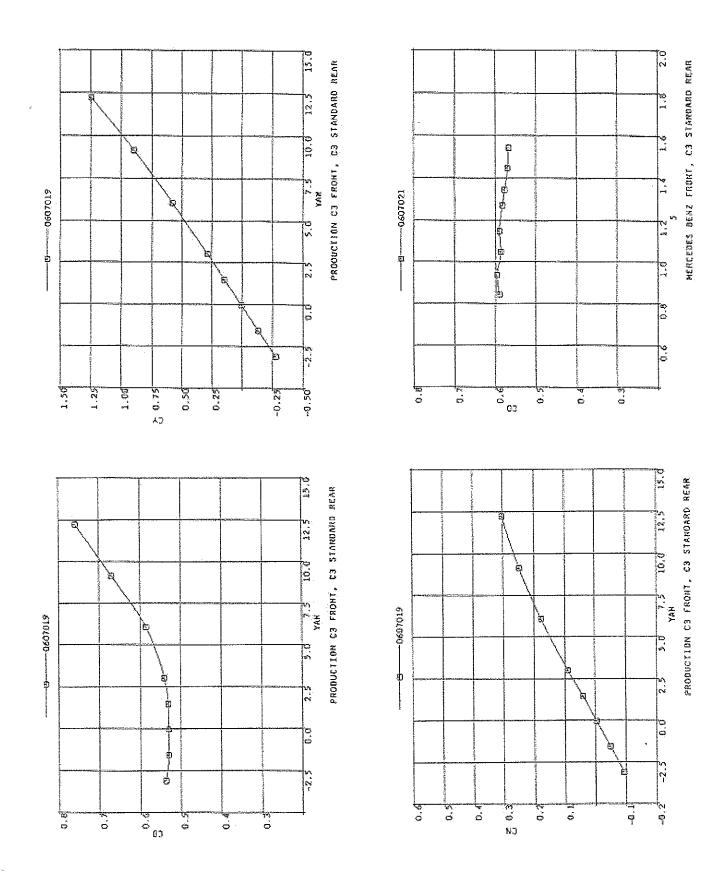
The following plots are presented in the order performed. Each yaw run is summarized by plots of drag coefficient, side force coefficient, and yawing moment coefficient, all versus yaw angle. The run designations are coded in the set of 7 numbers at the top of each plot and they are interpreted as a first group of four digits for the test number followed by three digits for the run number. Thus:

060702 = Test 607, Run 26

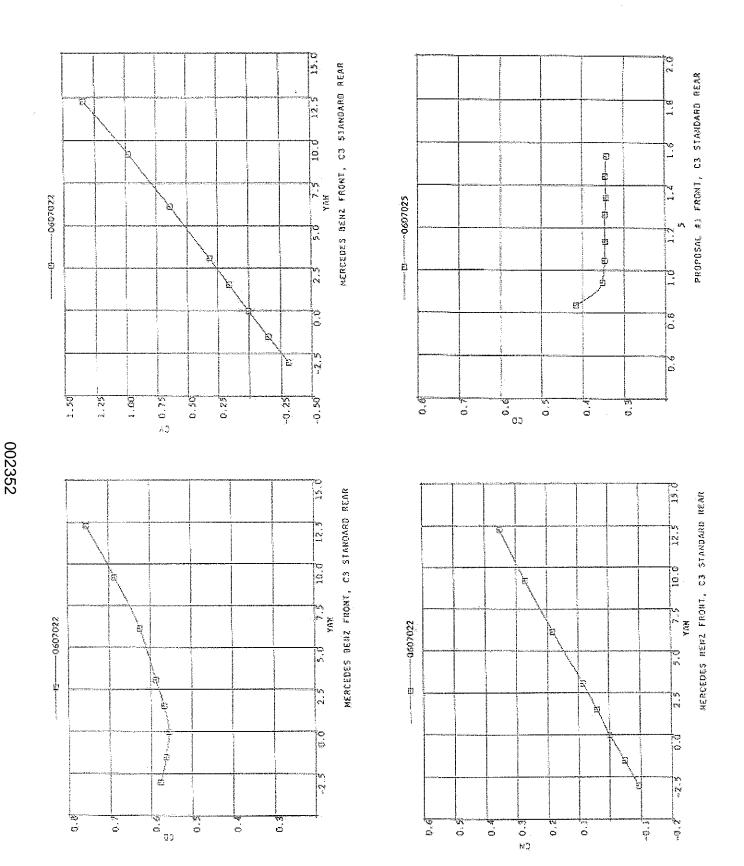


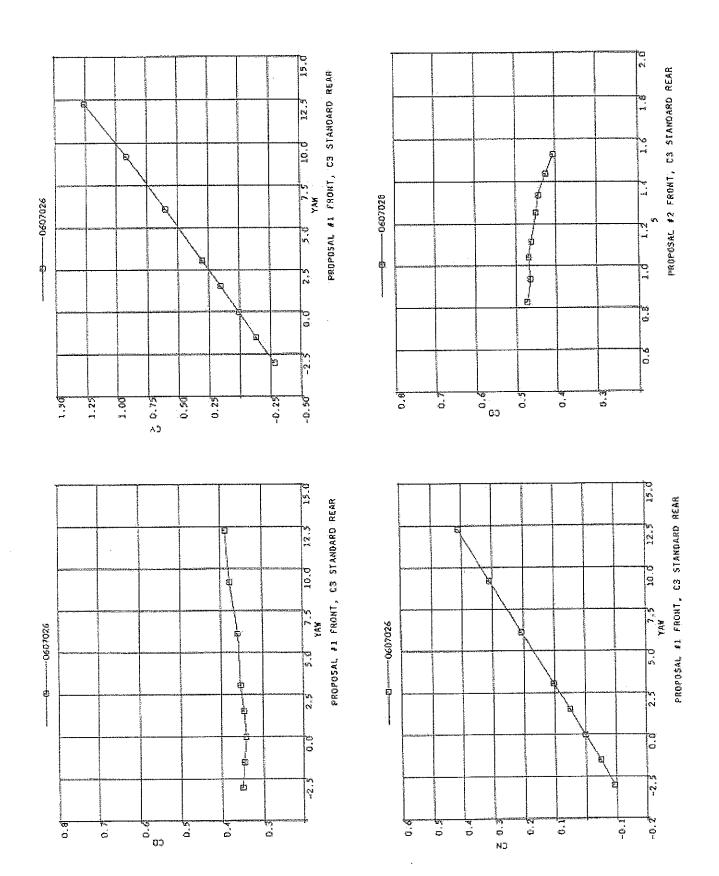
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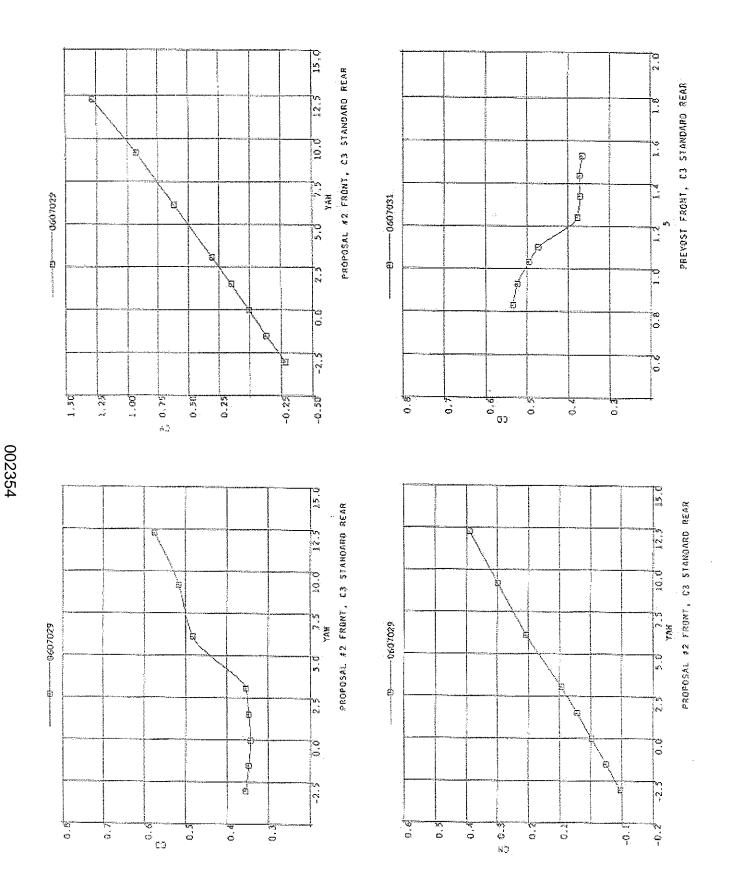


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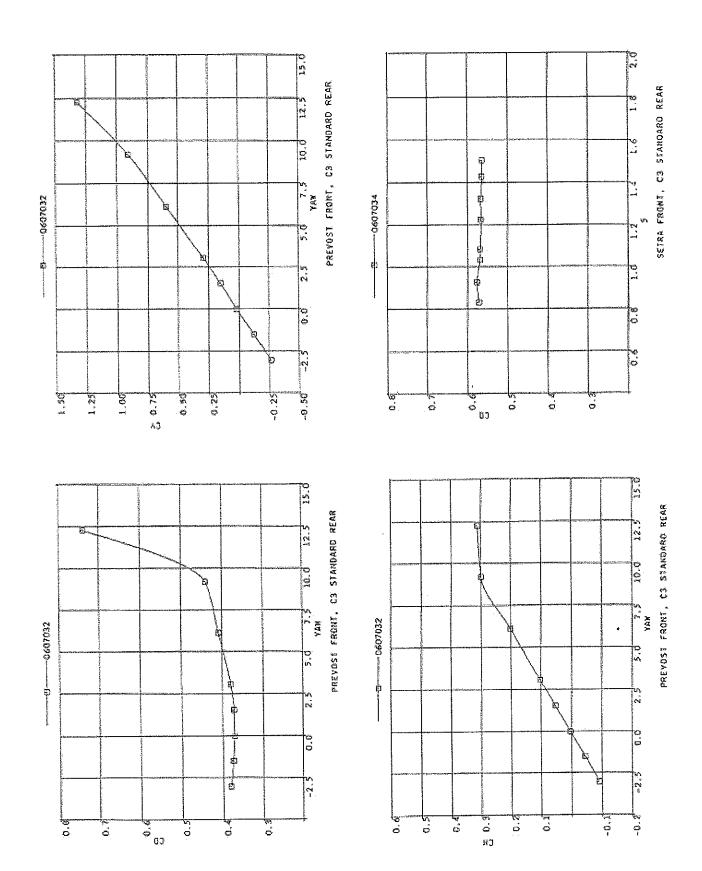


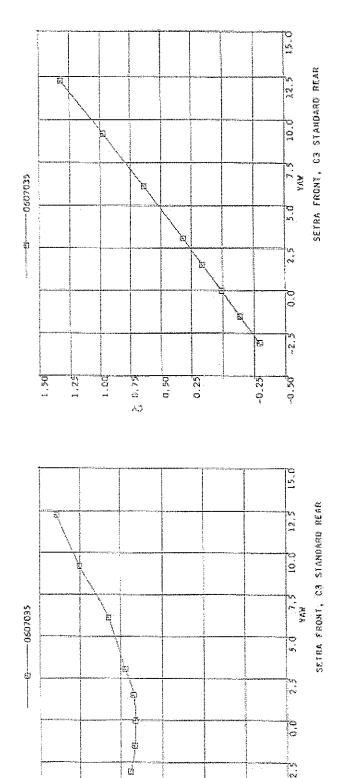


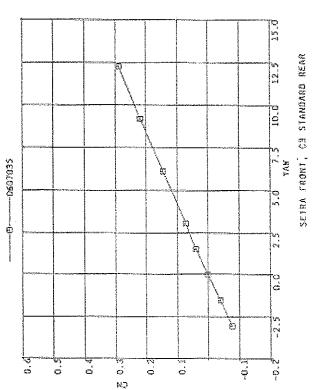
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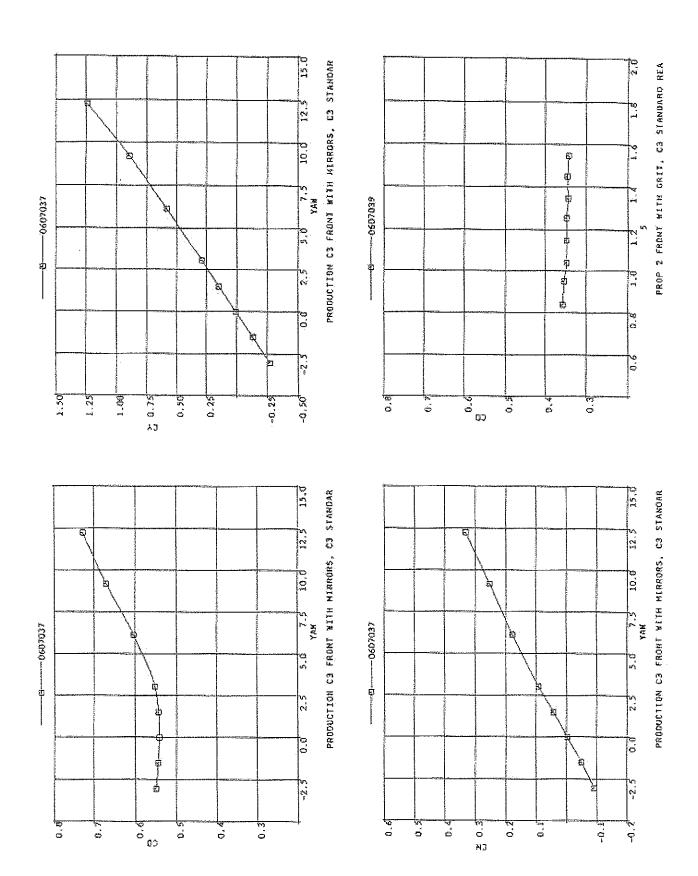


MCI - 039930



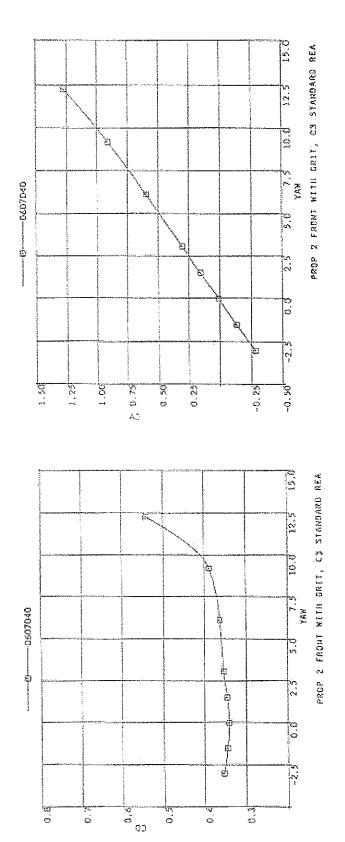


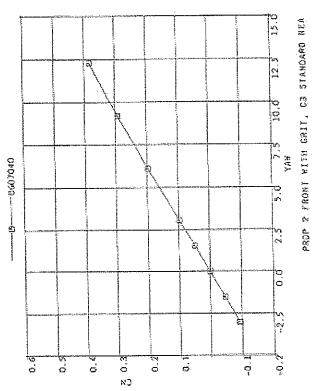


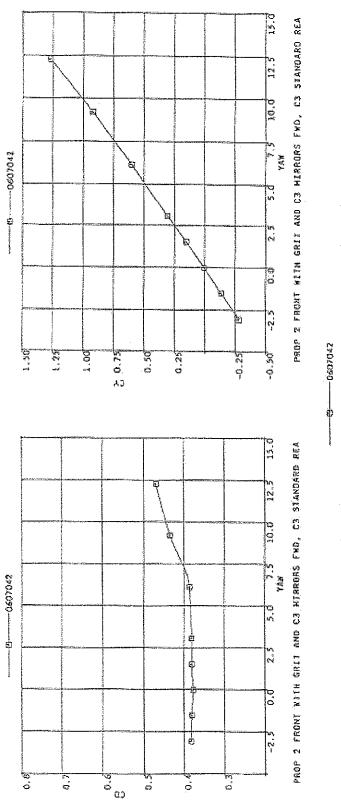


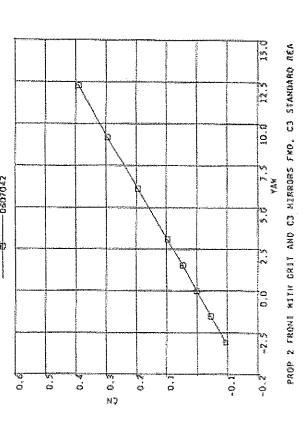
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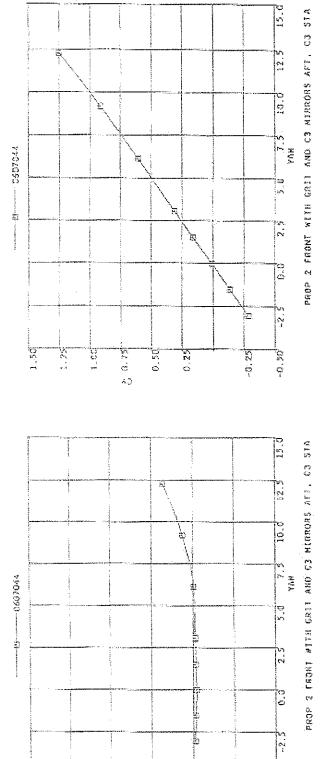
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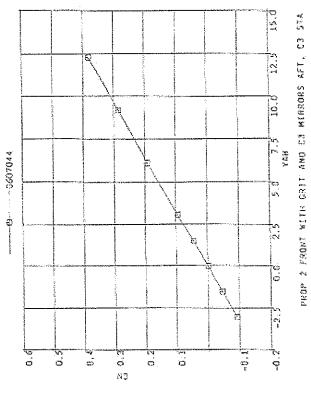


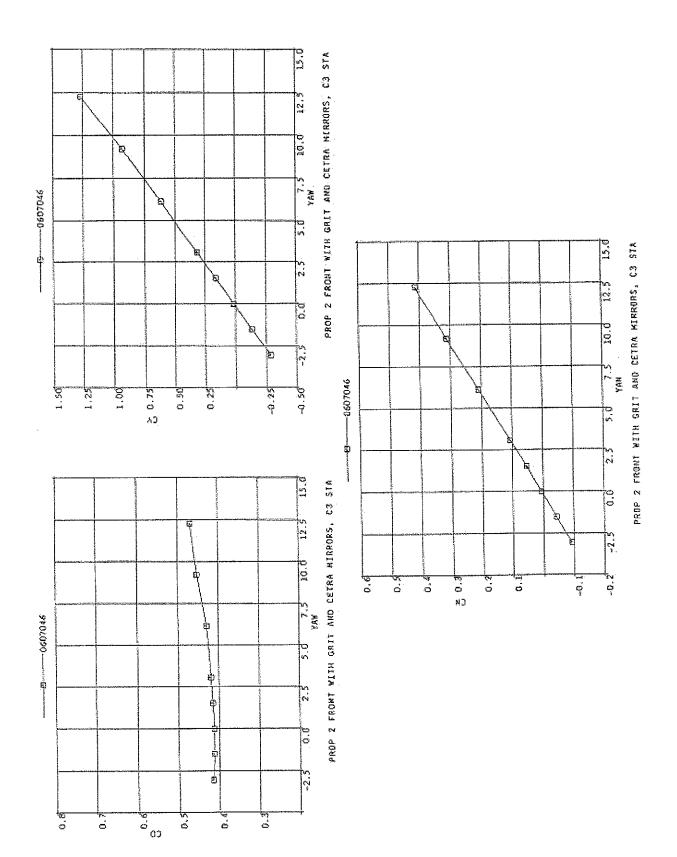


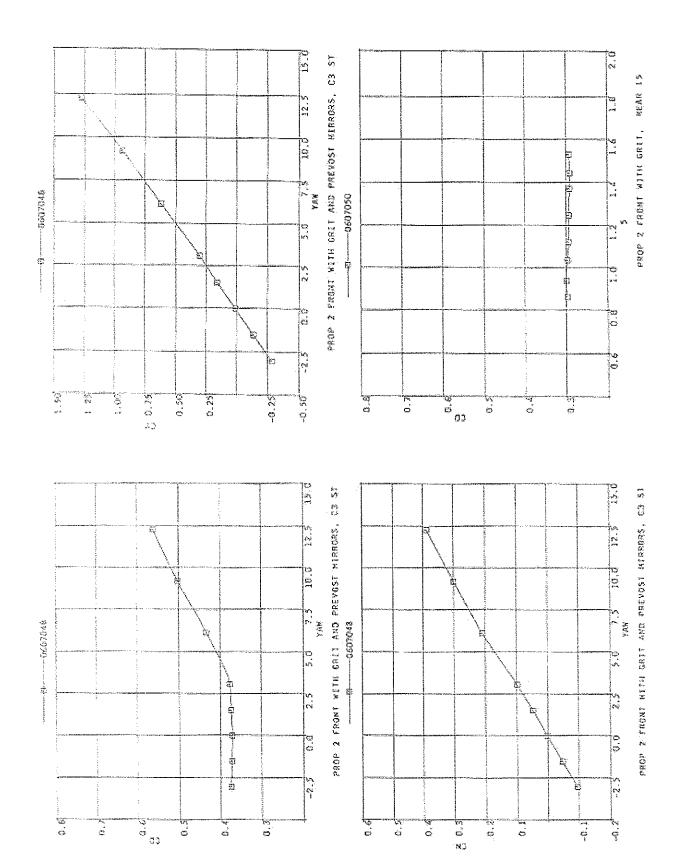




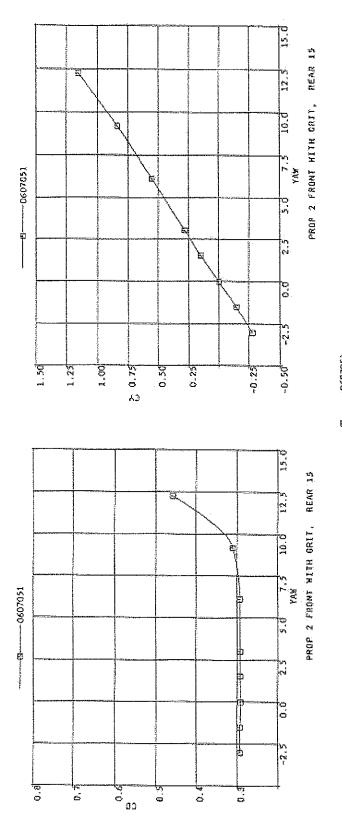


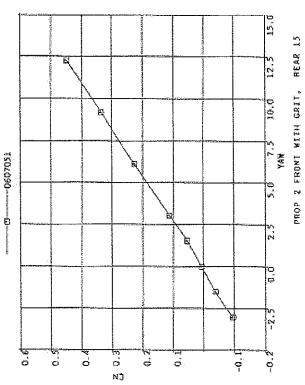


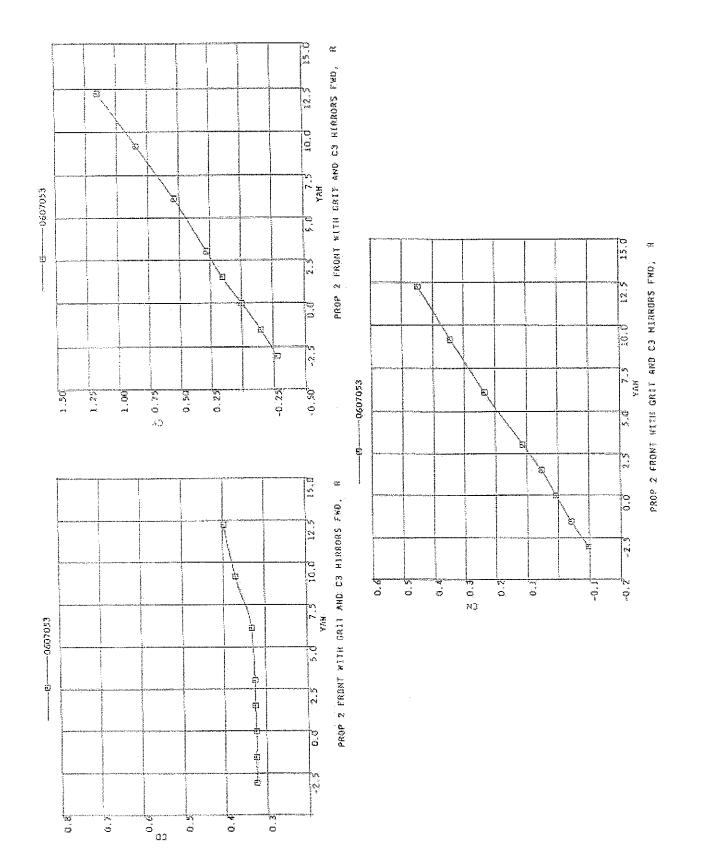


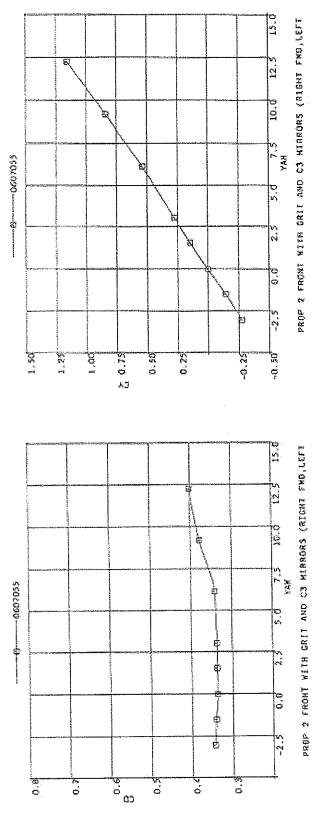


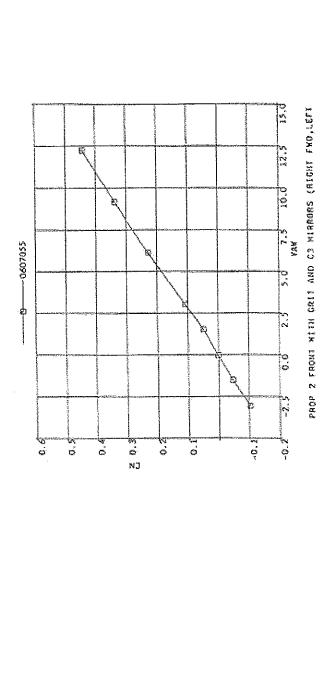
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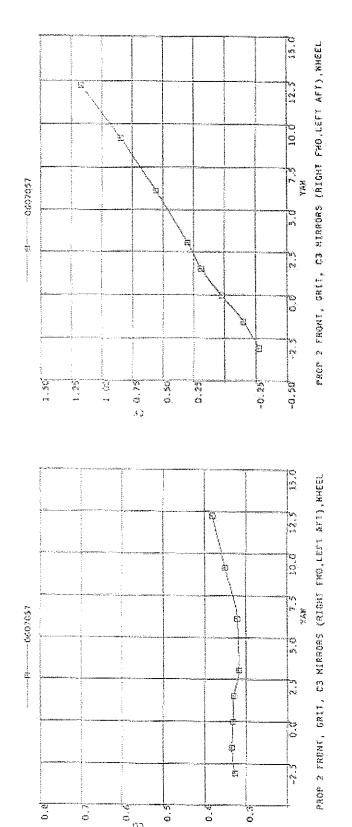


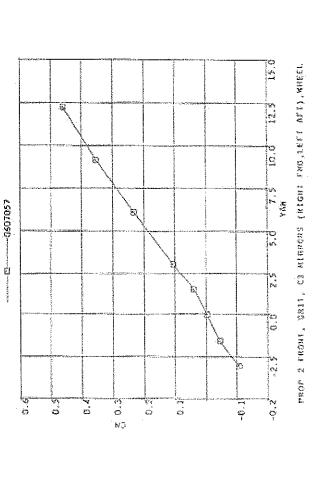


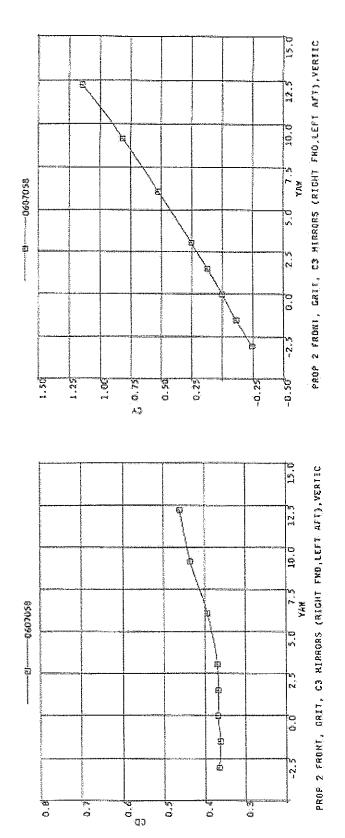


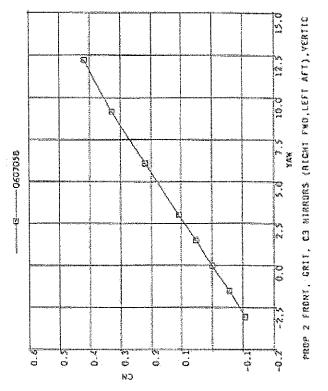


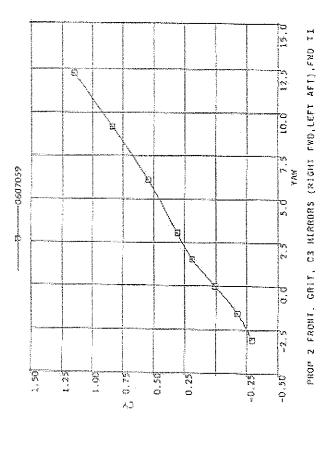


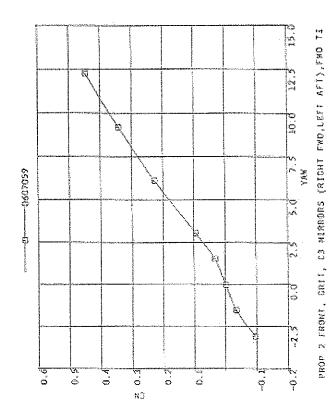


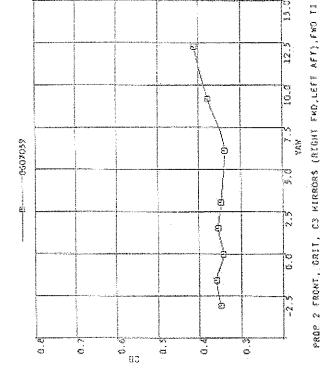


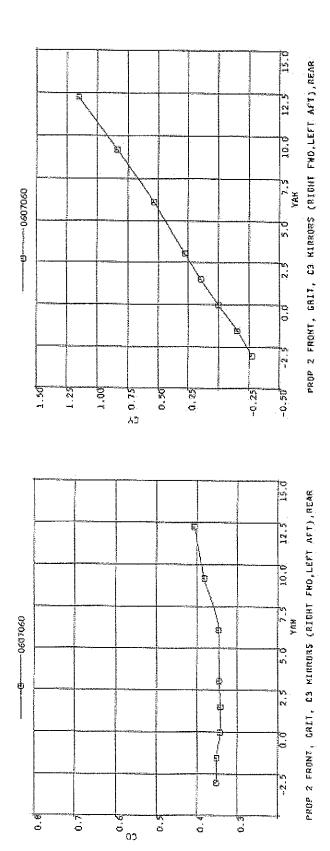


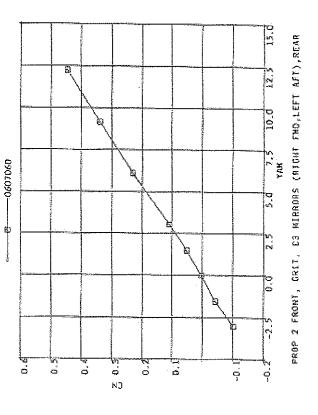


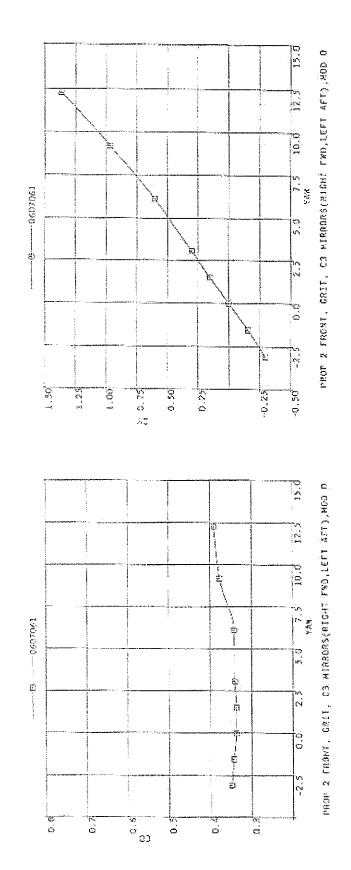


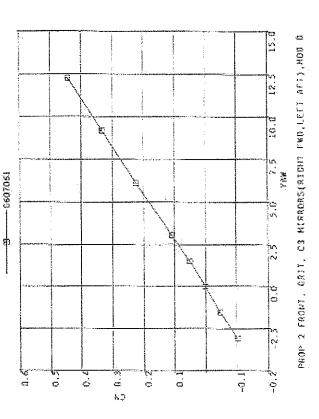


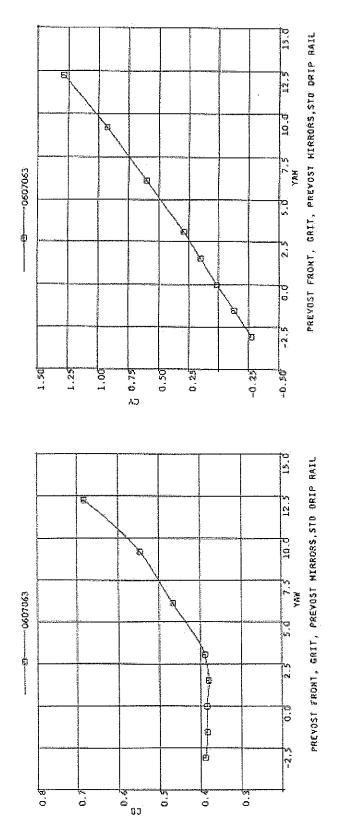


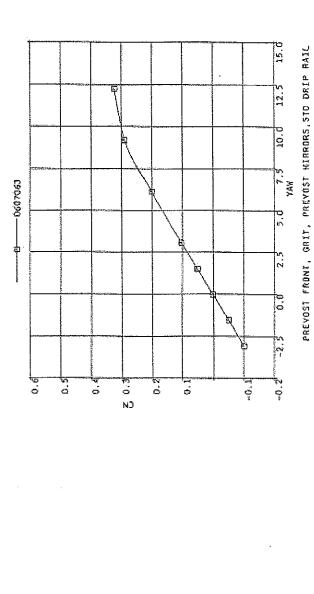


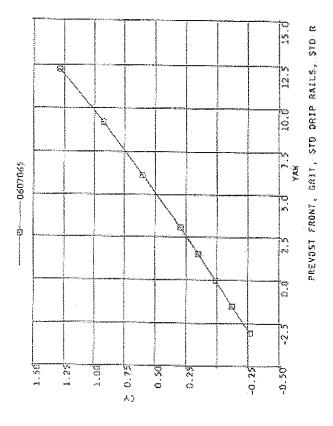


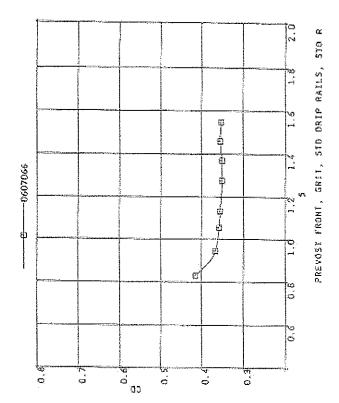


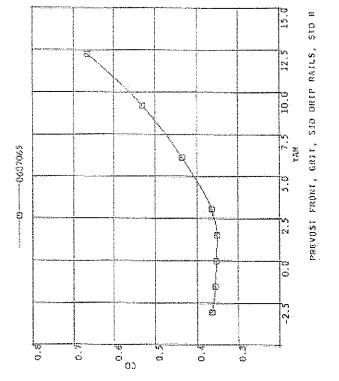


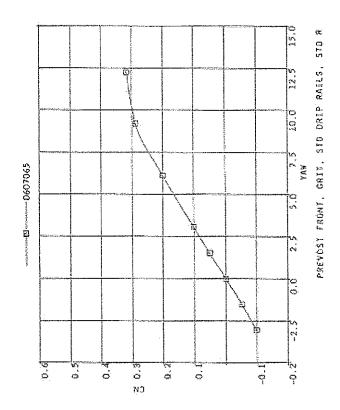


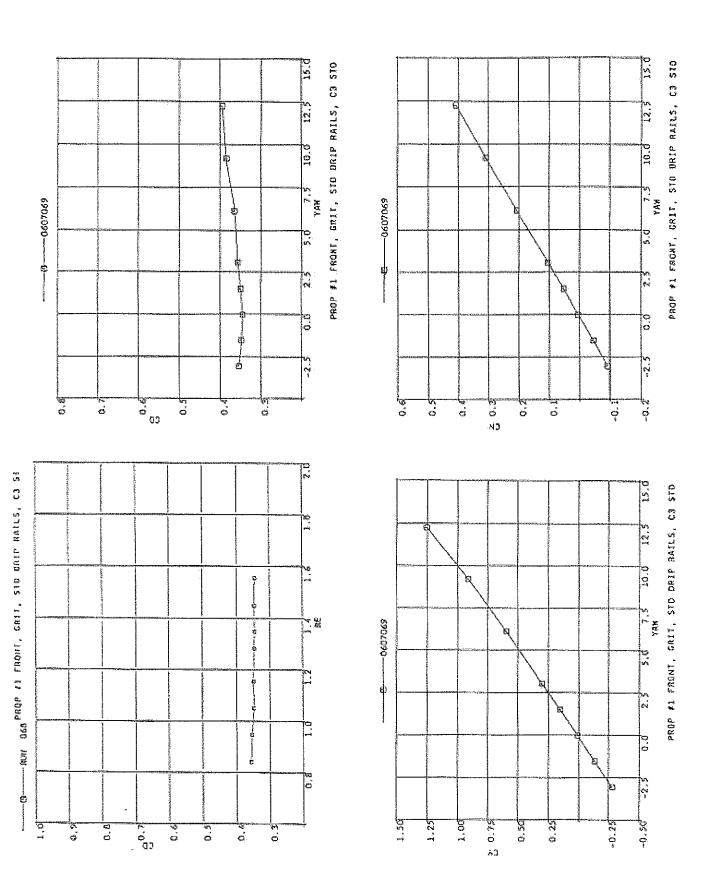












61.

MCI - 039949

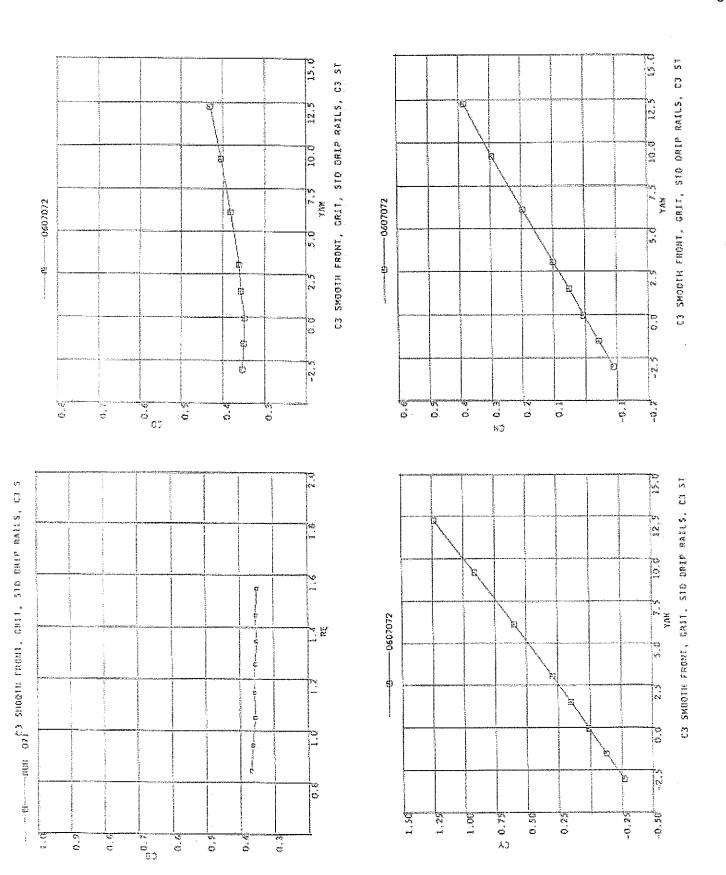


EXHIBIT 7

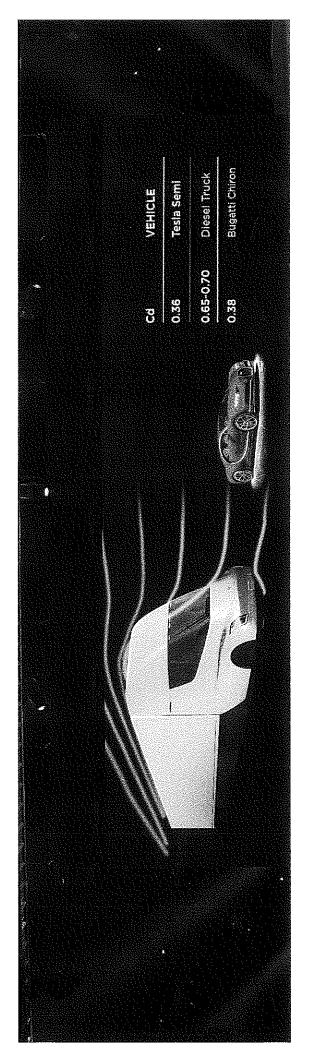


EXHIBIT 8

```
DISTRICT COURT
1
                        CLARK COUNTY, NEVADA
2
    KEON KHIABANI and ARIA
3
     KHIABANI, minors by and
     through their natural
                                 ) CASE NO.:
                                 ) A-17-755977-C
    mother, KATAYOUN BARIN;
     KATAYOUN BARIN,
     individually; KATAYOUN
6
    BARIN as Executrix of
     the Estate of Kayvan
     Khiabani M.D.
     (Decedent), and the
8
     Estate of Kayvan
     Khiabani,
 9
    M.D. (Decedent),
                 Plaintiffs,
10
11
     vs.
     MOTOR COACH INDUSTRIES,
12
     INC. A Delaware
13
     corporation;
     MICHELANGELO LEASING
     INC. D/b/a RYAN'S
14
     EXPRESS, an Arizona
     corporation; EDWARD
15
     HUBBARD, a Nevada
     resident; BELL SPORTS,
16
     INC. D/b/a GIRO SPORT
17
     DESIGN, a California
     corporation; SEVENPLUS
     BICYCLES, INC. D/b/a Pro
18
     Cyclery, a Nevada
     corporation; DOES 1
19
     through 20; and ROE
     CORPORATIONS 1 through
20
     20.
                  Defendants.
21
22
                VIDEOTAPED DEPOSITION OF BRAD LAMOTHE
                          LAS VEGAS, NEVADA
23
                       WEDNESDAY, OCTOBER 11, 2017
24
                      KAREN L. JONES, CCR NO. 694
       REPORTED BY:
                      JOB NO.:
                                422125
25
```

1	Page 36 THE WITNESS: I'm not that familiar with	
2	the Setra, the full Setra line.	
3	BY MR. KEMP:	
4	Q. But you do understand in general that	
5	the more you round the corner like a bullet train,	
6	for example, the better aerodynamics you'll have?	
7	You do understand that?	
8	A. Uh-huh.	
9	Q. Yes?	
10	A. And the higher the speed, the more of a	
11	factor that would be.	
12	Q. Great. Whose job was it to make sure	
13	that the aerodynamics design of the J4500 was	
14	reasonably safe, in your term?	
15	A. Well, I don't know that aerodynamics is	
16	a is a safety factor. The shape of the front of	
17	the coach, I'm not aware that that would be a safety	
18	factor.	
19	Q. So as far as you know, when the J4500	
20	was designed, no one looked at aerodynamics as a	
21	safety factor as far as you know?	
22	MR. RUSSELL: Objection. Foundation.	
23	THE WITNESS: Not to my knowledge.	
24	BY MR. KEMP:	
25	Q. Did you understand that a coach that had	

1	Page 47 Do you see that statement?
2	A. I see it.
3	Q. Did MCI make any effort in designing the
4	J4500 to reduce the aerodynamic drag by modifying
5	the shape of the front of the coach?
6	MR. RUSSELL: Objection. Foundation.
7	THE WITNESS: I have no knowledge of
8	that.
9	BY MR. KEMP:
10	Q. So as far as you know, there was no
11	effort made in that regard?
12	MR. RUSSELL: Same objection.
13	THE WITNESS: To my knowledge, no.
14	BY MR. KEMP:
15	Q. Now, flipping back to the front page, do
16	you know whether or not A D R Systems made a formal
17	proposal to MCI?
18	A. Not that I'm aware of.
19	Q. If someone made a formal proposal to
20	attempt to reduce drag, how would that be processed?
21	Where would it go? Who would get it? Who would
22	evaluate it?
23	A. Well, it would depend how to came to the
24	company. If it came if they approached our
25	marketing group or if they approached our

```
Page 50
                 Why is lack of visibility on the right
1
         Q.
     side not a hazard as opposed to a concern?
2
                 I don't believe there is lack of
3
    visibility on the right-hand side.
                 You think that coaches have right --
         Q.
5
     have right-side visibility?
6
                 I believe they do.
         Α.
                 You think they do, okay.
         Q.
9
                 I'll mark this as 2.
                  (Exhibit 2 marked.)
10
11
     BY MR. KEMP:
                 I've handed you for review an article
12
         Q.
     marked as Exhibit 2 entitled, quote "Many buses have
13
     built-in blind spots that make driving them
14
     dangerous, " unquote, by Brian Sherlock dated
15
16
     November 5th, 2015.
                  Do you see that the document?
17
                  I see it.
         Α.
18
                  In 2015, that's, what, 10, 12 years
19
         Q.
     after the J4500 was designed?
20
                  About that, yes.
21
         Α.
                  And according to Mr. Sherlock -- let's
22
         Q.
                    He says, quote, "Essentially all
     go to page 2.
23
     transit buses in the United States are built as
24
     cheaply as possible with mirrors and pillars that
25
```

	Page 55	
1	J4500 design project design process?	
2	MR. RUSSELL: Objection. Foundation.	
3	You can answer.	
4	THE WITNESS: Oh, okay. Well, I'm aware	
5	that we polled a wide variety of drivers as we were	
6	developing that coach.	
7	BY MR. KEMP:	
8	Q. Polled?	
9	A. Polled. We had a wide variety in size	
10	and experience that sat in the driver's seat and	
11	that drove the coach under controlled circumstances	
12	to evaluate and give feedback.	
13	Q. Well, we'll get to a little bit of that	
14	feedback here in a minute.	
15	My question was what design actions, if	
16	any, were taken to eliminate or modify right-side	
17	blind spots?	
18	A. None that I was directly involved with,	
19	so I don't know.	
20	Q. Do you know if anything was done?	
21	MR. RUSSELL: Objection. Foundation.	
22	THE WITNESS: I don't know.	
23	BY MR. KEMP:	
24	Q. Now, if you go to the next page of the	
25	article, page 3, Mr. Hanley, president of the Bus	
ł		

1	Page 59 a clean sheet of paper that was basically designed	
2	on a computer screen. It was done in CAD.	
3	Q. So you think there was some sort of	
4	computer simulation done with regards to the E	
5	series to determine line-of-sight and visibility	
6	obstructions?	
7	A. I would think there probably was.	
8	Q. Thinking they were probably thinking	
9	that there probably was and telling me that there	
10	was are two different things. Do you recognize	
11	that?	
12	A. Right, but I can't say. I can't say	
13	I've seen it.	
14	Q. And why do you think it probably was	
15	done?	
16	A. Because that was part of the kind of	
17	things that we did.	
18	Q. Would you agree with me that to do a	
19	competent job of design engineering on the E series	
20	you would have to do the line-of-sight and	
21	visibility obstructions of some sort?	
22	A. I would say that would be best practice.	
23	Q. Why is that?	
24	A. It's just commonly accepted best	
25	practice.	

```
Page 69
                 I think I asked this question, but I
1
         Q.
     want to make sure. As we sit here today, do you
 2
     know whether or not the air displacement from the
     front of a J4500 is greater than or less than the
     air displacement that you would get from a Setra 500
 5
     going at the same speed?
 6
 7
                 Well, I have no familiarity with the
     Setra 500, so I really couldn't comment on that.
 8
                 So the answer's, no, you don't know the
 9
         Q.
     answer to that question?
10
                 Can you repeat the question.
11
         Α.
                 Do you know whether or not the side
12
         Q.
     force or air displacement generated by a J4500 is
13
     greater or less than that generated by a Setra 500
14
     assuming that both vehicles are going 25 miles per
15
     hour?
16
         Α.
                 I don't know.
17
                 MR. KEMP: Let me mark this as 3.
18
19
                  (Exhibit 3 marked.)
20
     BY MR. KEMP:
                 I'm going to hand you a document that's
21
         Q.
     dated July 2012 with regards to the Setra. And
22
     specifically the document says on page four that
23
     they have done aerodynamic styling to lower fuel
24
                   And it says that they have achieved a
     consumption.
25
```

1	Page 70 drag coefficient of .33.
2	Do you see that statement?
3	A. I see that.
4	Q. Now, earlier you told me you thought the
5	J4500 had a .3 or .4 drag coefficient as well; is
6	that correct?
7	A. No. I said I speculated that it would
8	be in some kind of a range of .3, .4.
9	Q. And in reality, it's more in the .8
10	range?
11	A8?
12	MR. RUSSELL: Objection. Foundation.
13	THE WITNESS: Not to my knowledge.
14	BY MR. KEMP:
15	Q. You still think it's .3 to .4?
16	A. I believe most tour coaches are in that
17	range.
18	Q. All right. And next statement, "The
19	designer the engineers designed the front of the
20	Comfort Class 500 with larger radii for the roof
21	slope.
22	Am I pronouncing that right?
23	A. Radii, I guess, yeah.
24	Q. How do you spell that? R-a-d-i-i,
25	radii?

1	Page 71 A. That's how they spelled it, yeah.	
2	Q. Is that the way you're supposed to spell	
3	it?	
4	A. To my knowledge, yeah.	
5	Q. So in addition to making the right-hand	
6	corners more rounded, you can also make the the	
7	roof slope more rounded; is that correct, in theory?	
8	A. In theory.	
9	Q. Was any consideration given when you	
10	designed the 4500 to design it with a larger radii	
11	for the roof slope?	
12	MR. RUSSELL: Objection. Foundation.	
13	THE WITNESS: Not that I'm aware of.	
14	BY MR. KEMP:	
15	Q. Next statement, quote, "The A pillar was	
16	also redesigned enabling the flow loss on the front	
17	surface to be reduced significantly in placing the	
18	airflow in this area on the vehicle body, " unquote.	
19	Did I read that right?	
20	A. That's what it says, yeah.	
21	Q. Was any consideration given to doing	
22	that when you designed the J4500?	
23	MR. RUSSELL: Objection. Foundation.	
24	THE WITNESS: Not to my knowledge.	
25	BY MR. KEMP:	
- [

```
Page 72
                 You could have made the J4500 --
1
         Q.
     designed and made the 4500 designed with a larger
2
     radii for the roof slope if you'd wanted to, right?
3
                 MR. RUSSELL:
                                Objection.
                               I don't know if that's
                 THE WITNESS:
5
     true or possible.
6
     BY MR. KEMP:
                 So you think Mercedes can make the Setra
8
         Q.
 9
     with a larger radii for the roof slope, but MCI
     cannot make a J4500 with a larger radii for the roof
10
11
     slope?
                 MR. RUSSELL:
                                Object.
12
                               No, I don't think that.
                                                          Ι
                 THE WITNESS:
13
     think they're selling a different coach into a
14
     different market. They don't sell this in North
15
     America as far as I know.
16
     BY MR. KEMP:
17
                  I'm asking you if theoretically you
18
         Q.
     could have designed and made the 4500 with a larger
19
     radii for the roof slope if you wanted to?
20
                  MR. RUSSELL: Objection. Foundation.
21
                                I quess it would be
22
                  THE WITNESS:
23
     possible.
     BY MR. KEMP:
24
                  I mean this is not advanced space
25
         Q.
```

```
Page 73
                  This is just changing the shape of a
1
     technology.
     roof, right? Right?
2
                 MR. RUSSELL: Objection. Incomplete
3
    hypothetical. Argumentative.
    BY MR. KEMP:
 5
                 Is there any reason you can think of why
 6
         ο.
     the Japanese could make a bullet train that's
 7
     aerodynamic efficient in 1964 and MCI couldn't make
     a J4500 with a larger radii for the roof slope in
 9
     2007?
10
                 MR. RUSSELL: Objection. Incomplete
11
     hypothetical. Argumentative.
12
                 THE WITNESS: Trains and tour coaches
13
     are not the same vehicles.
1.4
15
     BY MR. KEMP:
                 I'm just asking if there's any reason
16
         Q.
     you can think of that it couldn't be manufactured
17
     that way?
18
                 MR. RUSSELL: Same objections.
19
     BY MR. KEMP:
20
                 You know like, for example, you needed
21
         Q.
     some rare part like lithium and it's not available
22
     or something like that. Okay. Any practical reason
23
     you can think of that MCI couldn't have made a J4500
24
     with a larger radii for the roof slope?
25
```

1	Page 74 MR. RUSSELL: Same objections.
2	THE WITNESS: I don't know.
3	BY MR. KEMP:
4	Q. You don't know of any?
5	A. I just don't know.
6	Q. Can you give me any practical reason as
7	we sit here today why MCI couldn't make a J4500 with
8	a larger radii for the roof slope?
9	MR. RUSSELL: Same objections.
10	THE WITNESS: No.
11	BY MR. KEMP:
12	Q. Now the next statement they say that
13	they redesigned the A pillar. Do you see that
14	statement?
15	A. I see that.
16	Q. Is there any reason the J 45 couldn't
17	have been made with a redesigned A pillar such as
18	they did to the Setra 500?
19	MR. RUSSELL: Same objections.
20	THE WITNESS: I think we asked that one,
21	didn't we, a couple questions ago.
22	BY MR. KEMP:
23	Q. I want to know if there's any practical
24	reason it couldn't have been done.
25	A. I don't know.
1	

EXHIBIT 9

```
DISTRICT COURT
1
                    COUNTY OF CLARK, NEVADA
2
   KEON KHIABANI and ARIA KHIABANI, )
   minors by and through their
   natural mother, KATAYOUN BARIN,
   KATAYOUN BARIN, individually,
   KATAYOUN BARIN as Executrix of
   the Estate of Kayvan Khiabani,
   M.D. (decedent), and the Estate
   of Kayvan Khiabani, M.D.
   (Decedent),
             Plaintiffs,
                                    )Case No. A-17-755977-C
9
   vs.
   MOTOR COACH INDUSTRIES, INC.,
10
   a Delaware corporation;
   MICHAELANGELO LEASING, INC.,
11
   d/b/a RYAN'S EXPRESS, an Arizona )
   corporation; EDWARD HUBBARD, a
12
   Nevada resident; BELL SPORTS,
   INC., d/b/a GIRO SPORT DESIGN, a
13
   California corporation;
   SEVENPLUS BICYCLES, INC., d/b/a
14
   Pro Cyclery, a Nevada
   corporation; DOES 1 through 20;
15
   And ROE CORPORATIONS 1 through
   20.
16
             Defendants.
17
18
19
           *********
                      ORAL DEPOSITION OF
20
                         PABLO FIERROS
                        October 8, 2017
21
                       *********
22
23
24 Job No.: 420700
25
```

1	Q.	Page 9 Okay. Great. Did there come a time that you
2	worked fo	r Motor Coach Industries or an affiliate of
3	Motor Coa	ch Industries?
4	Α.	I worked for Universal Coach Parts.
5	Q.	And what time period did you work for them?
6	Α.	I believe it was '97 to 2000.
7	Q.	And what was your job in general?
8	Α.	I was vice president and general manager.
9	Q.	Where was Universal Coach Parts located?
10	Α.	In Chicago.
11	Q.	And when you say Chicago, would that be
12	Des Plain	es?
13	Α.	That's correct.
14	Q.	And that's D-E-S, new word P-L-A-I-N-E-S.
15		Who was your immediate supervisor while you
16	were the	vice president and general manager of Universal
17	Coach Par	ts?
18	A.	Jim Bernacchi.
19	Q.	And I believe that's spelled B-E-R-N-A-C-C-H-I.
20	Is that -	. -
21	Α.	I believe that's I believe that's correct.
22	Q.	Okay. And what was your understanding of
23	Mr. Berna	acchi's position at that time?
24	Α.	I believe he was the CEO of Motor Coach
25	Industrie	es.

Page 10 Was he also the president? 1 Q. I don't remember. 2 Okay. But you think he was the CEO from '97 to 3 Q. 2000 when you were at Universal Coach Parts. correct? 5 I believe he was the CEO, yes. I don't 6 Α. remember if he was both president and CEO. That I don't remember. 9 Q. Okay. Did you report directly to 10 Mr. Bernacchi? Bernacchi. I did. 11 Α. 12 Did you re- -- okay. Q. You asked me that. I said yes. 13 Α. And where were you located at physically in 14 terms of an office building? 15 I don't remember the address, but it was in a 16 Α. separate building than -- than Jim Bernacchi. 17 And was it near Mr. Bernacchi's Okay. 18 building? 19 About -- about 10 blocks away. 20 And how many employees did you have as the 21 22 vice president and general manager of Universal Coach Parts? 23 I believe the number was close to 1,200. 24 Were they located at the same place you were? 25 Q.

```
Page 13
               I don't know exactly how or when, but I do.
    about it.
2
            Do you know a man named Chris Ferrone,
    F-E-R-R-O-N-E?
             My God, I -- the -- the name sounds somehow
    familiar.
                   And do you know a man named Mark Barron
 6
             Okay.
    B-A-R-R-O-N, also named Mark Bowen, B-O-W-E-N?
             The first one sounds more familiar than the
 9
    second one.
             Does the second one, Mr. Barron or Bowen, sound
10
    familiar in any way, shape or form?
11
12
             No, no.
         Α.
                 Okay.
13
         0.
             No:
             Are you having --
14
         Α.
             Do you remember?
15
         Q.
             Are you having problems hearing me?
16
         Α.
         Q.
             I think we're talking over each other a little
17
18
    bit.
         Α.
             Okay. Okay.
19
             I'm not having a problem hearing you, but --
20
    but I think we're talking over each other a little bit.
                  Okay. Back to the S-1 Gard, do you
22
    remember at some point in time someone came to you and
23
    offered you this product, referring to the S-1 Gard?
         A. Formally offering, no, I don't remember.
25
```

Page 19 Is that correct? J4500 or not. 1 I couldn't tell you. It is correct. Agree. 2 Okay. Fair. 3 Q. And does this letter remind you that you provided S-1 GARDs to New Flyer customers -- customers 5 that had New Flyer buses? 6 I do not. Α. All right. Apart from the S-1 Gard, are you 8 familiar with any other type of barrier safety device that manufacturers of buses either did or could put in 10 front of the right rear tires to move people or objects 11 out of the way? 12 There was a device, I believe it was British, I 13 don't remember the -- the name, but it was in the front 14 of the bus and it attempted to do something similar to 15 If you -- if you remember some of the spoilers 16 this. that were popular in the '70s and '80s in race cars that 17 looked like they were sweeping the front, that's what 18 that device looked like. 19 Okay. And did you sell any of those? 20 No. 21 Α. But that was designed for the front Okay. 22 tires as opposed to the rear tires. Is that correct? 23 That was designed for the front of the bus for 24

25

the whole bus.

```
Page 20
             Okay. And have you heard the term spats,
1
         Q.
2
    S-P-A-T-S, before?
             No, I have not.
3
         Α.
             How about wheel guards, have you heard of wheel
    guards that are attached to the rear tires?
             Yes.
6
         Α.
             Okay. And what do you call those?
             Did you say "splash" a while ago?
9
             I said "spats."
         Q.
             Oh, spats, no. Spats, no.
10
         Α.
11
             Spats.
         Q.
             What do I call the devices that go behind the
12
         Α.
             The -- the splash guards you said?
13
    wheels?
             Okay. All right. Have you heard of the
14
         Q.
    device, a protective barrier that goes on the outside of
15
    the rear tires to prevent the tires from coming into
16
    contact with something on the outside of it?
17
             No, I -- I don't.
18
             Okay. While you were at Universal Parts [sic],
19
    did MCI ever solicit your -- your input with regards to
20
    safety features?
21
                  I -- I don't --
22
         Α.
             No.
                  Actually, let me take that back.
23
    possible that they would ask me a question like that on
24
    a bus that they didn't manufacture, but it most
25
```

```
likely -- it would have been a question as in check with
1
   your team, because they knew I was not an engineer so I
2
   couldn't give them a -- a -- an opinion.
                                               So -- so if
    they would have asked my opinion on a safety device, I
    think they would ask me more to check with my team.
             Okay. Did you have safety engineers on your
6
         ٥.
 7
    team?
             I did.
         Α.
 9
         Q.
             How many?
             I believe the department had three, four people
10
         Α.
    that did some engineering work. They verified specs on
11
    products that we -- that we sold.
12
             Okay. And do you know whether or not those
13
    safety engineers ever evaluated the S-1 Gard?
14
             I don't remember doing any evaluation of
15
    S-1 Gard.
16
             Before you sold or resold the product, would --
17
    would the standard procedure be to do some sort of
18
19
    evaluation?
             Absolutely.
20
         Α.
21
             Okay.
         Q.
22
         Α.
23
             Now --
         Q.
             There are many products in the bus that have
    already been used for years before that, no, we probably
25
```

Page 22 did not do a complete and thorough investigation of every single part. Do you know what a proximity sensor is? 3 Α. Yes. And, for example, some cars have devices that 5 alert you whether or not there's a car or bicycle either to your front or on the side of you. Yes. Α. And -- and -- and do you have a car like that Q. yourself? 10 Α. No. 11 Now with regards to proximity sensors, while 12 you were at Universal Coach Parts, did you sell any 13 14 proximity sensors? 15 Α. I don't remember. Do you remember one way or the other whether or 16 not any devices that you were involved with in any way, 17 shape or form had proximity sensors on it? 18 Not specifically, no. 19 And after leaving Universal Coach Parts in 20 2000, did you have any involvement with the bus 21 industry? 22 I went to work for Enroute Communications, 23 which was a startup company doing wireless communication 24

between the base and the moving coach transit bus,

Page 23 train, vehicle. So we build wireless communication And one of the industries that we attempted to 2 go to was the bus industry. Okay. And what time period were you with them? ٥. Them became me. I was part of the company. 5 Α. After the initial startup, I became owner of the company -- part owner of the company. We -- 2000 to 2005 approximately. 8 And then where'd you go in 2005? 9 I went back -- I went to -- I started a -- a 10 Α. 11 consulting company doing sales consulting and I worked in the retail automobile. And after that I came to 12 El Paso with my present employer. 13 And that would be Stewart & Stevenson? 14 15 Α. Correct. And that's spelled S-T-E-W-A-R-T, ampersand, 16 Stevenson, S-T-E-V-E-N-S-O-N. Correct? 17 Stevenson, correct. 18 Α. Okay. Now, when you were with ENroute from 19 2000 to 2005, did you try and sell any products to MCI? 20 21 Α. No. You didn't try to sell the wireless device to 22 Ο. 23 MCI? 24 No. Α. Did you try to sell it to Universal Coach 25 Q.

Page 29 Just to make sure we got Okay. (BY MR. KEMP) it right. As you understand it today, the majority of buses have driver seat belts. Right? Α. Yes. And you don't know one way or the other whether or not the majority have passenger seat belts? I don't know. Α. Q. Correct? I don't know. Α. But do you know that passenger seat belts are 10 used in more buses today than they were back in 1997 11 through 2000? Do you know that one way or the other? 12 MR. DACUS: Object to form and foundation. 13 I don't know. 14 Α. Now, do you have an 15 (BY MR. KEMP) Okay. Q. understanding one way or the other whether or not a bus 16 such as the J4500 creates an air blast or air 17 displacement at its right front when it's traveling? 18 I have no idea. 19 Okay. And are you aware that there -- or, 20 strike that. 21 Have you ever heard of a part called a 22 spoiler that goes along the front right side or the left 23 side of the bus to change the air flow? 24 Not specifically in buses, no. 25

```
Page 33
1
   way?
            No, I don't remember it, no.
2
        Α.
                             Thank you. I don't believe I
                  MR. DACUS:
3
   have any further questions.
                  MR. KEMP: Are you done, Mr. Dacus?
5
                  MR. DACUS: I am.
7
                       FURTHER EXAMINATION
   BY MR. KEMP:
                   You said that you saw a flier similar to
9
         Q.
    and then you held up a document. Was that Exhibit 3?
10
             No, the one that I held up was Exhibit 5.
11
    was looking for the other one and I can't find it.
12
             Could you find Exhibit 3 for a second, please.
13
14
             I have it.
             So the flier you saw was either the same or
15
16
    similar to Exhibit 3. Is that correct?
             I guess. I guess. I don't specifically
17
               It -- it -- it's -- it's vaque in my memory.
    remember.
18
             Okay. But you saw some flier similar to
19
    Exhibit 3 that related to the S-1 Gard.
                                              Is that
20
21
    correct?
             Yeah, I think somebody handed to me something
22
23
    like that, yes.
                    And Mr. Dacus asked you if you'd seen
24
             Okay.
25
    any technical papers.
```

```
Page 35
             Was that something that happened a lot when you
1
   went to these trade shows, people would mail you stuff
    afterwards?
         Α.
             Hundreds.
             Hundreds of times?
5
         Α.
             Correct.
 6
             Because you're a customer, they're trying to
    get your business.
                        Right?
 9
             I -- yeah.
         Α.
             Okay. And Counsel asked you if you'd seen any
10
    technical paper on the S-1 Gard. As you sit here today,
11
    do you remember one way or the other whether you saw
12
    Exhibit 7 before at any time?
13
             No, I don't remember.
14
         Α.
             So this may and may not have been among the
15
    hundreds of things that you were mailed after trade
            Is that correct?
17
    shows.
             That's correct.
18
         Α.
             And with regards to this particular trade show
19
    at Indianapolis in November 1998, as we sit here today,
20
    do you remember whether or not you went to that?
21
                               I went to most of the trade
22
         Α.
             I probably did.
    shows so the likelihood that I went to this one is very
23
```

And is it also high because Indianapolis is

24

25

high.

Q.

EXHIBIT 10

```
DISTRICT COURT
1
                     COUNTY OF CLARK, NEVADA
2
3
5
    KEON KHIABANI AND ARIA KHIABANI,
    MINORS BY AND THROUGH THEIR NATURAL
    MOTHER, KATAYOUN BARIN, ET AL.,
                 Defendants.
                                               No. A-17-755997-
8
          vs.
                                                    C
    MOTOR COACH INDUSTRIES, INC., A
    DELAWARE CORPORATION, ET AL.,
10
                 Defendants.
11
12
13
           VIDEOTAPED DEPOSITION OF DAVID DORR, a witness
14
           herein, noticed by Kemp, Jones & Coulthard, at
15
           355 South Grand Avenue, Los Angeles, California,
16
           at 10:08 a.m., on Wednesday, September 13, 2017,
17
           before Jana Ruiz, CSR 12837.
18
19
           Job No.: 416514
20
21
22
23
24
25
```

DAVID DORR, VOLUME I - 09/13/2017

```
Page 26
          Now, have you taken any courses in aerodynamics?
1
              No.
2
          Α.
              Okay.
3
          Q.
          What is your understanding, if you have an
     understanding, as to whether or not when a 2007 vintage
5
     J4500 is traveling 35 to 40 miles an hour, what is your
6
     understanding as to whether or not it causes air blasts
     or air displacements from the bus?
8
9
          Α.
              I don't know.
10
          Q.
              Okay.
          You don't know one way or the other whether it
11
     would cause air blasts or air displacements?
12
              No, I don't.
13
              And same question with regards to the -- in the
14
     back, it has rear tires; correct?
15
1.6
          Α.
              Yes.
              Double set of rear tires.
17
          What is your understanding, if any, with regards to
18
     whether or not a suction effect will be created when a
19
     bus is moving 35, 40 miles an hour from those two rear
20
     tires?
21
               I don't -- I don't know.
22
              You don't know one way or the other whether
23
     there is a suction or not a suction?
24
               I don't know.
25
          Α.
```

DAVID DORR, VOLUME I - 09/13/2017

```
Page 27
1
          Q.
              Okay.
          So is -- okay.
2
          Do you have a standard sales pitch that you give to
3
     customers about the J4500?
5
          Α.
              No.
          There's not a standard.
7
          Q.
              Okay.
          Well, let me ask a little differently then.
8
          Since you don't know whether or not a J4500 will
9
     cause air blasts from the front, I assume you've never
10
     discussed that point with a customer?
11
          Α.
              No.
12
              I'm correct, you've never discussed that point
13
14
     with a customer?
              I've never discussed that, no.
15
          Α.
              And you've never discussed whether or not the
16
     back tires have some sort of suction effect with the
17
     customer?
18
19
          Α.
              No.
              Is that correct?
20
          ٥.
          Α.
              That's correct.
21
              Okay.
22
          Q.
          Now, I'd like to ask you to look at Exhibit --
23
     sorry, Darrell -- Exhibit 26 with me; okay?
24
           (Whereupon the document referred to is marked by
25
```

DAVID DORR, VOLUME I - 09/13/2017

```
Page 51
1
              So they were all J4500s?
          Q.
          Α.
 2
              Yes.
3
          Q.
              Okay.
          And so do you remember what course of time?
          You said you started meeting with him in 2002.
 5
          When did you -- when is the last time you met with
 6
     Mr. Haggerty?
 7
              Oh, I don't remember.
 8
 9
              Has it been within the last couple years or --
          Q.
10
          Α.
              No.
              So -- okay.
11
          Q.
          But you do recall dealing with him with regards to
12
     approximately 50 J4500s; right?
13
14
          Α.
              Yes.
15
          Q.
              Okay.
          Now, earlier I asked you if you had communicated
16
     with any customer about the subject of air blast
17
     potential, and you said no.
18
19
          Remember that testimony?
20
          Α.
              Yes.
21
          Q.
              Yes?
                     Okay.
          Would I be correct that you did not have any
22
     communications with Mr. Haggerty during any one of these
23
     50 bus sales about the potential for air blasts, if any,
24
     from the J4500?
25
```

DAVID DORR, VOLUME I - 09/13/2017

	Page 52
1	A. Yes, you're correct.
2	Q. And same question about the rear tires sucking
3	in, you didn't have any communications with him about
4	that subject either; correct?
5	A. Correct, no communications.
6	Q. Okay.
7	Do you recall any specific subjects you did talk to
8	Mr. Haggerty about, other than price and delivery dates?
9	A. It was price, trade values for trade buses,
10	mostly numbers.
11	Q. Okay.
12	Now, going back to Exhibit Number 2, if you take a
13	look at page 9, paragraph 15, there is a warning there.
14	You see that?
15	A. Page 9? Oh, MCI9. Okay.
16	Q. And the warning says, "This vehicle may contain
17	HCFC R-134A refrigerant, a substance which harms public
18	health and the environment by destroying ozone in the
19	upper atmosphere."
20	Did I read that right?
21	A. Yes.
22	Q. And that is the only warning I see in
23	Exhibit 2.
24	Do you see any other warning?
25	A. No.

EXHIBIT 11

DISTRICT COURT

COUNTY OF CLARK, NEVADA

KEON KHIABANI and ARIA KHIABANI, minors by and through their natural mother, KATAYOUN BARIN; KATAYOUN BARIN, individually; KATAYOUN BARIN as Executrix of the Estate of Kayvan Khiabani, M.D. (Decedent), and the Estate of Kayvan Khiabani, M.D. (Decedent),

Plaintiffs,

Case No. A-17-755977-C

vs.

MOTOR COACH INDUSTRIES, INC., a Delaware corporation; MICHELANGELO LEASING INC. d/b/a RYAN'S EXPRESS, an Arizona corporation; EDWARD HUBBARD, a Nevada resident; BELL SPORTS, INC. d/b/a GIRO SPORT DESIGN, a California corporation; SEVENPLUS BICYCLES, INC. d/b/a Pro Cyclery, a Nevada corporation; DOES 1 through 20; and ROE CORPORATIONS I through 20.

Defendants.

VIDEO DEPOSITION OF CHRISTOPHER GROEPLER

September 14, 2017 11:09 a.m.

20 E Thomas Road, Suite 2200 Phoenix, Arizona, 85012

Prepared by: Sandra Marruffo, R.P.R., AZ C.R. 50815

Job Number: 418116

CHRISTOPHER GROEPLER - 09/14/2017

1	Page 19 A. Yes.
2	Q. Okay. All right. Now, do you have a general
3	understanding one way or the other whether or not air
4	blasts are created at the front sides of a J4500 when
5	it's traveling 35 or 40 miles an hour?
6	A. No.
7	Q. Okay. And broadening the question out, do you
8	know way or the other whether or not if a J4500 moves
9	about 35 or 40 miles an hour that there's any sort of
10	disturbance of the air in the front of the bus?
11	A. No.
12	Q. Okay. Assuming, for the sake of argument, that
13	there is an air blast created when a J4500 moves, do you
14	disagree that that could potentially create a hazardous
15	situation for pedestrians and people on bicycles next to
16	the bus?
17	MR. ROBERTS: Objection to form,
18	foundation.
19	MR. FREEMAN: Are we still operating under
20	the agreement objection by one is objection by all?
21	MR. KEMP: Yes, that's fine by me.
22	MR. FREEMAN: Okay.
23	Q. BY MR. KEMP: Go ahead, sir. You can answer
24	the question.
25	A. No, I don't know.

EXHIBIT 12

```
DISTRICT COURT
 1
                     CLARK COUNTY, NEVADA
 2
 3
     KEON KHIABANI and ARIA KHIABANI,
     minors by and through their natural)
     mother, KATAYOUN BARIN; KATAYOUN
 5
     BARIN, individually; KATAYOUN BARIN)
     as Executrix of the Estate of
 6
     Kayvan Khiabani, M.D. (Decedent),
     and the Estate of Kayvan Khiabani,
     M.D. (Decedent),
 8
                                          ) Case No.
                       Plaintiffs,
                                          )A-17-755977-C
 9
                                          )Dept. No.
     VS.
                                          )XIV
10
     MOTOR COACH INDUSTRIES, INC., a
     Delaware corporation; MICHELANGELO )
11
     LEASING, INC. d/b/a RYAN'S EXPRESS,)
     an Arizona corporation; EDWARD
12
     HUBBARD, a Nevada resident; BELL
     SPORTS, INC. d/b/a GIRO SPORT
13
     DESIGN, a California corporation;
     SEVENPLUS BICYCLES, INC. d/b/a
14
     PRO CYCLERY, a Nevada corporation;
     DOES 1 through 20; and ROE
15
     CORPORATIONS 1 through 20,
16
                       Defendants.
17
1.8
           VIDEOTAPED DEPOSITION OF WILLIAM BARTLETT
19
                        LAS VEGAS, NEVADA
20
                    FRIDAY, SEPTEMBER 8, 2017
21
22
23
     REPORTED BY: HOLLY LARSEN, CCR NO. 680, CA CSR 12170
24
                   JOB NO.:
                             416787
25
```

WILLIAM BARTLETT - 09/08/2017

```
Page 139
    BY MR. KEMP:
1
              So you agree with me, if they know it's a
2
    potential hazard, they should tell you because
3
     you're the operator of their equipment?
              It's up to them. I can't tell them what to
5
         Α.
     do.
6
              But, as we sit here today, you don't know
7
         Q.
     one way or the other whether or not a bus will
 9
     create air turbulence or air blast that's going 30,
     35 miles an hour?
10
              MR. ROBERTS: Form and foundation.
11
                                            I've never
              THE WITNESS:
                            I don't know.
12
     tested it myself.
13
     BY MR. KEMP:
14
15
              And getting a little more specific here,
         0.
     are you familiar with an MCI J4500?
16
         Α.
              Yes.
17
              You're familiar with an MCI J4500?
18
19
         Α.
              Yes.
              And you don't know whether or not that, if
20
     you're traveling 30, 35, 40 miles an hour, will
21
     cause air turbulence or air blasts; correct?
22
                                       I mean, I assume it
              I don't know for sure.
23
     might because it's a large vehicle. But I've never
24
     been outside of an MCI passing me at 45 miles an
25
```

EXHIBIT 13

```
DISTRICT COURT
1
                        CLARK COUNTY, NEVADA
2
     KEON KHIABANI and ARIA
3
     KHIABANI, minors by and
                                 ) CASE NO.:
     through their natural
                                 ) A-17-755977-C
     mother, KATAYOUN BARIN;
5
     KATAYOUN BARIN,
     individually; KATAYOUN
     BARIN as Executrix of
6
     the Estate of Kayvan
7
     Khiabani M.D.
     (Decedent), and the
     Estate of Kayvan
8
     Khiabani,
     M.D. (Decedent),
9
                 Plaintiffs,
10
11
     vs.
     MOTOR COACH INDUSTRIES,
12
     INC. A Delaware
13
     corporation;
     MICHELANGELO LEASING
     INC. D/b/a RYAN'S
14
     EXPRESS, an Arizona
     corporation; EDWARD
15
     HUBBARD, a Nevada
     resident; BELL SPORTS,
16
     INC. D/b/a GIRO SPORT
17
     DESIGN, a California
     corporation; SEVENPLUS
     BICYCLES, INC. D/b/a Pro
18
     Cyclery, a Nevada
19
     corporation; DOES 1
     through 20; and ROE
20
     CORPORATIONS 1 through
     20.
                  Defendants.
21
22
               VIDEOTAPED DEPOSITION OF EDWARD HUBBARD
                          LAS VEGAS, NEVADA
23
                    WEDNESDAY, SEPTEMBER 20, 2017
24
                     KAREN L. JONES, CCR NO. 694
25
      REPORTED BY:
                      JOB NO.: 417421
```

		Page 76
1	Q.	All right.
2		Have you taken any courses in
3	aerodynamic	cs?
4	A.	No.
5	Q.	Do you have any special training of any
6	sort in ae	rodynamics?
7	A.	No.
8	Q.	Do you understand in general that a
9	large objec	ct will alter the surrounding airflow?
10	A.	I have no knowledge of that.
11	Q.	Do you have any sort of understanding
12	that a bus	, if it's moving at 30, 35 miles an hour,
13	will cause	air blasts or air disturbances at the
14	front of the	he bus? Have you ever heard of that?
15	Α.	Yes.
16	Q.	You have heard of that? Okay.
17		In what respect have you heard that?
18	Α.	I'm sorry. Can you say that again?
19	Q.	You said you have heard of that?
20	Α.	Of what? Of the
21	Q.	Of the bus, a large bus, is moving
22	strike tha	t. Let's make it more specific for you.
23		If a J4500 is moving forward at 30,
24	35 miles a	n hour, is it your understanding that
25	there are	no air blasts, some air blasts, air blasts

		Page 77
1	on some occ	asions?
2	Α.	I don't I don't know, sir.
3	Q.	Don't know one way or the other?
4	Α.	No, sir.
5	Q.	Okay. And we've referred to a number of
6	different t	ypes of buses that you said you drove.
7	And I wrote	down that you drove one was Serta;
8	right?	
9		MR. CHRISTIANSEN: Setra.
10		MR. KEMP: I started off wrong and I'm
11	going to so	rew up the whole case.
12	BY MR. KEMP);
13	Q.	You have driven a Setra before?
14	A.	Yes.
15	Q.	Is that a Setra 417?
16	A.	I don't know the number. I just know
17	it's a Setr	ra.
18	Q.	Okay. And you've also driven a Volvo?
19	A.	Yes, sir.
20	Q.	And what were the other the MCI we
21	talked abou	it. What were the other two?
22	Α.	Prevost.
23	Q.	P-r-e-v-o-s-t?
24	Α.	Yes.
25	Q.	And what else?
-		

I	Page 80
1	into account in how you drove your bus?
2	MR. STEPHAN: Objection to form.
3	THE WITNESS: I've answered it. I
4	don't know, sir. I don't know what you want me to
5	say, but
6	BY MR. KEMP:
7	Q. Is there a reason you wouldn't take that
8	into account?
9	A. Take what into the wind? I don't
10	know anything about the wind.
11	Q. Assuming for the sake of argument that
12	someone had told you
13	A. I couldn't I can't answer that
14	question because I don't know anything about
15	the wind and I don't know who's telling me. I don't
16	know
17	Q. Okay. Well, let me make it more
18	specific then.
19	Assuming today you got a bulletin from
20	the manufacturer of the bus that said, Our bus
21	creates a 10-foot air blast on the front, would you
22	take that into account when you were driving the bus
23	tomorrow, the next day, on?
24	MR. STEPHAN: Objection to form.
25	Answer.

	Page 81
1	THE WITNESS: Yes, sir.
2	BY MR. KEMP:
3	Q. And the reason you would take it into
4	account is because why?
5	A. Because the bus manufacturer's telling
6	me that it or
7	Q. That it's a potential safety hazard; is
8	that right?
9	A. Yeah.
10	Q. That's the reason you would take it into
11	account, right?
12	A. I'm sorry?
13	Q. Right? That's the reason you would take
14	it into account?
15	A. Because if that was part of my training,
16	yeah. If that's what they told me, right.
17	Q. All right. Now let me ask you a related
18	question.
19	Has anyone ever indicated to you that
20	the rear tires on a bus can create a negative air
21	situation, where people are sucked into the bus?
22	MR. STEPHAN: Objection to form.
23	BY MR. KEMP:
24	Q. Has anybody ever said that to you?
25	A. No.

```
Page 82
                                Sorry.
                                        I didn't mean to
                 MR. STEPHAN:
1
2
     interrupt.
                 I don't really want to keep
     interrupting.
 3
                 MR. KEMP: No, you're just supposed
     to say "Form; foundation." That's all you've got
 5
 6
     to say.
 7
                 MR. STEPHAN:
                                That's all I'm doing.
                            Believe me, I do it myself.
 8
                 MR. KEMP:
 9
                 MR. STEPHAN:
                                Thank you, sir.
10
     BY MR. KEMP:
                 Okay. Let's just make sure we got
11
         Q.
12
     this down.
                 So you didn't have any information from
13
     any source, including the manufacturer, that there
14
     was some sort of suction when you're driving a
15
     J4500 at 30, 35 miles an hour, that would pull
16
     objects or potentially pull objects or people into
17
     the rear wheels?
18
                               Form; foundation.
19
                 MR. STEPHAN:
                 THE WITNESS:
20
     BY MR. KEMP:
21
                  And when I say "the manufacturer," I'm
22
         Q.
     referring to MCI, the manufacturer of the J4500.
23
                  You didn't have that information?
24
                  No.
25
         Α.
```

1	Page 83 Q. And in any source, you didn't know
2	that from any source, right?
3	A. No.
4	Q. Now, same question that I asked before.
5	If MCI had sent you a directive saying, Hey, you
6	know, the rearview [sic] wheels potentially create a
7	suction that can pull people in, would you take that
8	into consideration in the future when you were
9	driving the bus?
10	MR. STEPHAN: Form; foundation.
11	THE WITNESS: Yes.
12	BY MR. KEMP:
13	Q. And for the same reason; that it was a
14	safety hazard, potential safety hazard?
15	A. Part of my training.
16	Q. Part of your training to be aware of
17	potential safety hazards?
18	A. Correct.
19	Q. So if you knew that there were either
20	air blasts or suction in the rear tires, you
21	would you would take that into account in how you
22	drive the bus?
23	MR. STEPHAN: Form; foundation.
24	THE WITNESS: Yes.
25	BY MR. KEMP:
	· · · · · · · · · · · · · · · · · · ·

```
Page 149
    Foundation.
1
                 THE WITNESS: I -- I would -- if
2
     something's going to alert me that I'm about to hit
3
     something before I hit it, or someone before, of
4
     course I'm going to do something.
5
                 But I don't know that that would have
6
     changed that situation, because of the maneuver that
     the gentleman made by just coming in as -- it was
8
     like this (indicating).
 9
10
     BY MR. KEMP:
                 Okay.
11
         Q.
                 It was -- it was -- it was a very --
         Α.
12
13
     that's --
                 But if there had been some sort of
14
         Q.
     warning light going off for whatever reason, you
15
     would have -- you would have heeded that?
16
                 MR. TERRY: Objection; form.
17
                 THE WITNESS: Again, I don't -- I don't
18
     know that.
19
20
     BY MR. KEMP:
                 My Mercedes has a proximity sensor.
21
         Q.
     there's a car to my right or an object to my right,
22
     there's a big red light that goes off in the mirror.
23
     You know? And there's a lot of cars where, if you
24
     do that, there's an audible warning.
25
```

1	Page 150 If something like that had happened and
2	you'd become aware that he was in that spot, even if
3	you didn't see him, would you have done something
4	about it?
5	A. I would have did exactly what I just
6	did.
7	MR. TERRY: Objection to form.
8	THE WITNESS: Which was take evasive
9	action to move away from the bike.
10	BY MR. KEMP:
11	Q. So if you'd been given some sort of
12	warning at the 50 or the hundred, you would have
13	taken evasive action earlier?
14	MR. TERRY: Objection; form.
15	THE WITNESS: Yes.
16	BY MR. KEMP:
1.7	Q. And the same, if one of your passengers
18	had said, Hey, you're getting close to a bicyclist,
19	at the 50 or the 100, you would have taken evasive
20	action earlier?
21	A. Of course.
22	MR. STEPHAN: Will, he doesn't have the
23	microphone on. Can you make sure we're getting
24	this?
25	MR. KEMP: Are you getting this?

Page 200 have a viewpoint. 1 2 BY MR. CHRISTIANSEN: Okay. Well, both of those gentlemen 3 Q. testified that they see in front of the bus that 5 bicycle the entire way until the collision, the entire way southbound on Pavilion Center. Did you 6 7 know that? MR. STEPHAN: Objection; foundation. 8 9 Form. THE WITNESS: 10 No. 11 BY MR. CHRISTIANSEN: And you did not see the bicyclist after 12 Ο. the 300-foot mark that you told for us, when you 13 believe you passed him at the cutout to the 14 15 municipal bus stop? 16 Α. Correct. You don't see him for a full 300-plus 17 Q. feet, until he just appears in your lane, right? 18 19 That's your testimony? Yes. 20 Α. And both of those gentleman who were 21 Q. seated behind you testified that he's in front of 22 you and they can see him the entire way southbound 23 down Pavilion Center. 24 MR. STEPHAN: Objection; form. 25

EXHIBIT 14

```
DISTRICT COURT
1
                     CLARK COUNTY, NEVADA
2
 3
     KEON KHIABANI and ARIA KHIABANI,
     minors by and through their natural)
     mother, KATAYOUN BARIN; KATAYOUN
 5
     BARIN, individually; KATAYOUN BARIN)
     as Executrix of the Estate of
 6
     Kayvan Khiabani, M.D. (Decedent),
 7
     and the Estate of Kayvan Khiabani,
     M.D. (Decedent),
 8
                       Plaintiffs,
                                          ) Case No.
                                          )A-17-755977-C
 9
                                          ) Dept. No.
     VS.
                                          ) XIV
10
     MOTOR COACH INDUSTRIES, INC., a
     Delaware corporation; MICHELANGELO >
11
     LEASING, INC. d/b/a RYAN'S EXPRESS,)
     an Arizona corporation; EDWARD
12
     HUBBARD, a Nevada resident; BELL
     SPORTS, INC. d/b/a GIRO SPORT
13
     DESIGN, a California corporation;
     SEVENPLUS BICYCLES, INC. d/b/a
14
     Pro Cyclery, a Nevada corporation;
     DOES 1 through 20; and ROE
15
     CORPORATIONS 1 through 20,
16
                       Defendants.
17
18
            VIDEOTAPED DEPOSITION OF ERIKA BRADLEY
19
                        LAS VEGAS, NEVADA
20
                    TUESDAY, AUGUST 15, 2017
21
22
23
     REPORTED BY: HOLLY LARSEN, CCR NO. 680, CA CSR 12170
                   JOB NO.: 407961A
25
```

Page 43 Q. As we sit here today, do you know what made
the bicyclist swerve?
A. I don't know.
Q. Could it have been windblast from the front
of the bus?
MR. NUNEZ: Form objection.
THE WITNESS: It's possible.
BY MR. KEMP:
Q. Okay. Is there anything else you can think
of that would make the bicyclist swerve based on
what you'd seen of him?
MR. ROBERTS: Objection. Foundation.
THE WITNESS: When we were standing on the
side talking and waiting for people to arrive, I
remember speaking with one of the security guards.
He had mentioned that they have bicyclists that bike
from Red Rock and sometimes they get dehydrated and
dizzy and that that could have happened. That made
sense to me. At that point other than that, I
didn't know what would have caused that to happen.
BY MR. KEMP:
Q. So the two operating theories are either a
windblast or perhaps the bicyclist was physically
impaired?
A. Correct.

	Page 44
1	Q. Okay. Anything besides that?
2	A. Not that I could think of.
3	Q. Okay. And as we sit here today, which
4	makes more sense to you now?
5	A. After discussing the wind drafts, that
6	could make sense.
7	MR. ROBERTS: Objection. Foundation.
8	BY MR. KEMP:
9	Q. So as we sit here today, you think it's
10	more likely than not that the bicyclist started
11	wobbling because of windblast?
12	MR. FREEMAN: Objection. Foundation.
13	THE WITNESS: That could be a possibility.
14	BY MR. KEMP:
15	Q. Okay. It could be a possibility, but
16	that's the most likely possibility as we sit here
17	today; right?
18	MR. ROBERTS: Objection.
19	MR. FREEMAN: Objection.
20	THE WITNESS: I'm not a scientist. I can't
21	make that judgment.
22	BY MR. KEMP:
23	Q. Okay. I'm just asking what you saw.
24	A. Right.
25	Q. Okay. All right. Now, with regards to how

Page 57 Did you notice anything about whether his 1 Q. helmet was crushed or not, bicycle helmet? 2 I did not pay attention to his helmet. 3 Do you know whether or not he had a bicycle Q. helmet on at the time of --5 He did have a helmet on. Α. 6 So you think his torso was crushed by the 7 Q. bus; is that correct? 8 I don't recall specifically. I think it 9 Α. was either, yes, his torso -- I don't think it was 10 his legs. 11 And what about the head? 12 ο. Okay. know whether or not the head was impacted by the 13 14 bus? 15 Α. That, I don't know for sure. Don't know one way or the other? 16 Q. 17 Α. No, sir. Let me show you a video that depicts Okay. 18 ο. a safety device known as the S-1 Gard. 19 (Video played.) 20 MR. KEMP: Okay. Stop. 21 BY MR. KEMP: 22 First of all, with the exception of the 23 safety device pushing the rider out of harm's way, 24 that was pretty much the way you think the bicycle 25

Page 58 rider in this case fell into the bus? 1 Α. Yes. MR. ROBERTS: Objection. Leading. 3 4 BY MR. KEMP: Torso under the back two tires? 5 0. Α. I believe so, yes. 6 So that video would be substantially 7 Okay. 0. similar to what you think happened? 8 9 Yes. Α. 10 Okay. Now, with regards to -- let me show Q. 11 you an actual S-1 device. 12 Okay. What this does is it fits on to the -- excuse me. It fits on the other way -- to 13 the front of the back rear tire here and then here's 14 the curved part. You understand from the video and 15 looking at this how it works mechanically? 16 Α. Uh-huh. 17 Okay. Based on the facts as you saw them, 18 do you think a device such as this would have saved 19 20 the doctor? MR. ROBERTS: Objection. Foundation. 21 22 THE WITNESS: It's possible. BY MR. KEMP: 23 I know it's possible, but based on 24 Okay. what you saw and what you remember, do you think 25

EXHIBIT 15

```
DISTRICT COURT
1
                  COUNTY OF CLARK, NEVADA
2
   KEON KHIABANI and ARIA
   KHIABANI, minors by and
3
   through their natural
   mother, KATAYOUN BARIN;
   KATAYOUN BARIN,
                                 Case No. A-17-755977-C
   individually; KATAYOUN
   BARIN as Executrix of
   the Estate of Kayvan
                                 Dept. No. XIV
   Khiabani, M.D.
    (Decedent), and the
   Estate of Kayvan
   Khiabani, M.D.
8
    (Decedent)
 9
          Plaintiffs,
10
   VS.
11
   MOTOR COACH INDUSTRIES,
    INC., a Delaware
12
    corporation;
   MICHELANGELO LEASING
13
    INC., d/b/a RYAN'S
   EXPRESS, an Arizona
14
    corporation; EDWARD
15
   HUBBARD, a Nevada
    resident; BELL SPORTS,
16
    INC. d/b/a GIRO SPORT
   DESIGN, a California
17
    corporation; SEVENPLUS
    BICYCLES, INC. d/b/a
   Pro Cyclery, a Nevada
18
    corporation; DOES 1
    through 20; and ROE
19
    CORPORATIONS 1 through
20
    20,
                                Job No.: 430151
21
           Defendants
22
              ********
                     ORAL DEPOSITION OF
23
                       ROBERT RUCOBA
                      November 10, 2017
24
              *********
25
```

ROBERT RUCOBA - 11/10/2017

```
Page 59
1
   Correct?
                I would agree with that.
         Α.
                Okay.
                       So can we rule out weather as a
3
         Q.
   cause of the bicycle wobble?
                Sure.
5
         Α.
                            So what I'm left with is
                All right.
6
         Q.
   plaintiff's theory of windblast and no -- no
    evidence for any other cause.
                    MR. BARGER:
                                  Form.
                (By Mr. Kemp)
                                I know you don't agree
1.0
         Q.
   with windblast. I'm not suggesting you do.
11
   none of the other causes have -- potential causes,
12
    six, you have any evidence that supports them.
13
                And, again, with regard to wobble, I
1.4
    don't know how many times I've had to say this, but
15
    it's -- there is no physical evidence that I can
1.6
    rely upon. It's purely based on testimony.
17
    all we have to go with. Now, if we're going to talk
1.8
    about the causes of the crash, those are the factors
19
    I outlined for you at the beginning of the
20
21
    deposition.
                We'll get to the causes of the crash.
22
         Q.
    You know, I always like to start at the beginning,
23
    which is the wobble, and then move to the contact.
24
           We'll get to the contact, I promise.
25
    Okay?
```

ROBERT RUCOBA - 11/10/2017

1	Page 75 Are you familiar with that system?
2	A. Yes. Her's, I believe, does give you
3	some sort of an audible signal as well.
4	Q. Okay. Did that come with the car or did
5	you order that as an option?
6	A. I ordered that as an option.
7	Q. And why did you think a blind-spot
8	warning system in your wife's Kia would be a good
9	option?
10	A. Well, my wife's not a very good driver.
11	I thought this would be an assistance to helping her
12	drive better.
13	Q. Do you drive the car yourself?
14	A. I do.
15	Q. Have you found it to assist you well
16	as well?
17	A. It's helpful.
18	Q. And I assume you're a good driver.
19	A. I think I am.
20	Q. Okay. So even a good driver like you
21	can be assisted by a blind-spot warning system.
22	Correct?
23	A. Sure.
24	Q. Have you had any problems when you're
25	driving the Kia, you personally, when things

EXHIBIT 16

Robert E. Breidenthal 5722 NE 56th Street Seattle, Washington 98105-2004

Daytime telephone (206) 685-1098 Home telephone (206) 522-8718 Fax (206) 543-0217

E-mail

breidenthal@gmail.com

October 24, 2017

Eric Pepperman, Esq. Attorney Kemp, Jones & Coulthard, LLP Wells Fargo Tower, 17th Floor Las Vegas, NV 89169

Dear Eric:

I have reviewed the additional materials you sent me concerning the case of Khiabani v. MCI, which include

- i) Opinion letter of Dr. James R. Funk dated October 19, 2017
- ii) Opinion letter report of Mr. Kevan J. Granat dated October 18, 2017
- iii) "A wind tunnel investigation of the aerodynamic characteristics of buses for motor coach industries", K. R. Cooper. Motor Coach Industries Engineering Test Report 93-0026, Institute for Aerospace Research, LTR-AA-9, August 1993.

My opinions are based on these documents.

- 1) The aerodynamic force on a cyclist depends on the speed of the relative wind. Thus the aerodynamic force on a moving cyclist would be different from the measured force on a stationary cyclist dummy. The force measurements on a cyclist reported by Mr. Granat (Reference ii) appear to be limited to an ATD cyclist dummy that is stationary.
- 2) The effect of the aerodynamic force on the dynamics of the cyclist will depend on the total impulse of the force, which is the integral of the force over time. The time interval that the force acts on a cyclist, and hence this integral, will be greater for a cyclist moving along in the same direction as the bus than for a stationary dummy because the bus passes a stationary dummy more rapidly than it passes the moving cyclist. Thus the impulse depends on the relative speed of the bus and the cyclist. The duration of the aerodynamic force increases over that on a stationary dummy by about a factor of about 2.2 for the moving cyclist at 13.5 mph and the bus speed of 25 mph, with a relative speed of 11.5 mph. Mr. Granat's Report (Reference ii) does not mention any impulse measurements.
- 3) This report also does not indicate the frequency response of the load cell used to measure the force. If the frequency response of the load cell is inadequate, the measurement of the transient force will not be correct. Neglecting ambient wind, the lateral airflow on a stationary dummy both before and after bus

passage is zero. Consequently, the average lateral aerodynamic force is also essentially zero. A slow load cell will tend to smear out the oscillating transient force and yield a low peak force.

- 4) Even with a perfect load cell of infinite frequency response, the inertia of the stationary dummy will tend to reduce the output of the load cell under rapidly oscillating aerodynamic loads. Only if the mass of the test dummy apparatus was zero would the force applied to the load cell equal the true instantaneous aerodynamic force. According to page 5 of Mr. Granat's Report, the ATD cyclist combination weighs 214.5 lbs. For the reasons listed in paragraphs 1-4, the force experiment with the stationary dummy is not similar to what occurred in the accident.
- 5) According to page 7 of the opinion letter of Dr. Funk, the cyclist's speed was approximately 13 14 mph. Using a figure of 13.5 mph instead of the value of 8 mph assumed in the illustrative example in my opinion letter of October 4th, I estimate that the magnitude of the oscillating lateral force on the cyclist is again approximately 10 lbs. The other assumptions are unchanged (an ambient wind out of the west of 6 mph, a local flow speed of 40 mph with respect to the bus at the position of the cyclist near the right front corner of the bus and a 30 degree angle of that flow). This estimate is conservative in the sense that it does not account for the additional contribution from a lateral pressure gradient toward the bus associated with curved streamlines near the region of separated flow.
- 6) The aerodynamic testing of various bus geometries in the MCI wind tunnel report (Reference iii above) indicates that by modifying only the shape of the front of the bus, the drag coefficient was reduced from 0.558 ("Standard CJ3") to 0.357 ("Proposal 2") at the higher tunnel speed of 120 km/h, a reduction of about 36% (Table 6.1 on page 13). This decrease in drag coefficient corresponds to a reduction in the region of separated flow, so that the effective aerodynamic width of the bus is reduced. Another shape, "Proposal 1", performed nearly as well. It appears that MCl did not use the optimum combination Proposal 2 with the beveled aft end in the accident bus.

Very truly yours,

Robert E. Breidenthal

Pobet E. Breidenthal

EXHIBIT 17

Alexander W. LaRiviere Bicycle Accident Investigations 11842 Diggles St. / P.O. Box 130 Fort Jones, CA 96032

December 08, 2017

Will Kemp, Esq. Kemp, Jones & Coulthard,LLP Wells Fargo Tower, 17th Floor Las Vegas, Nevada 89169

AMENDED REBUTTAL REPORT

Re:

Khiabani vs. MCI

Dear Mr. Kemp:

I am amending my Rebuttal Report dated 10-22-2017. The opinions contained within my Rebuttal report dated 10-22-2017 have not changed, new field work was performed in support of my previously expressed opinions. The fieldwork that I performed demonstrates how a 35 mph wind force was measured to generate approximately 5.0 pounds of force upon the forward left side of a front wheel tire assembly, and how when 5.0 pounds of force is laterally placed upon a front wheel tire assembly it produces approximately 10.0 pounds of force on the left side of the handlebar, when measured 4 inches from the center of the stem clamp on the left side of the handle bar, along the angle of the steering column, to the corresponding location on the seat post.

An exemplar Scott Racing road bicycle was loaded with a person weighing 192 pounds. The person was mounted upon the seat and was measured for weight distribution under the front and rear tires. A mounted calibrated load cell was used to measure the weight under each tire. The weight distribution was measured with the rider in three different seated riding positions; (a) no hands on the handlebars, (b) only the right hand on the handlebar, (c) both right and left hands on the handlebars. The weight under each of the front and rear tires was measured at each hand position.

Results: (a) Front wheel, no hands 65 lbs.

- (b) Front wheel, right hand only 77 lbs.
- (c) Front wheel, both hands 86 lbs.
- (d) Rear wheel, no hands 121 lbs.
- (e) Rear wheel, right hand only 137 lbs.
- (f) Rear wheel, both hands 147 lbs.

The exemplar Scott Racing bicycle was then loaded with weights, the front wheel was placed upon a load cell and was measured at 65 pounds. The bicycle's front wheel tire assembly, with 65 pounds measured under the front tire, was then placed upon a smooth piece of used roadway asphalt, a

calibrated push/pull scale was used to measure the pounds of force exerted by the 35mph wind speed. A modified van traveling at approximately 35 mph was used to create the 35mph wind speed. The bicycle was mounted within the van, perpendicular to the van, approximately in the middle of the van. The piece of asphalt was mounted to a platform which extended beyond the side of the van, the front wheel of the bicycle was extended out the open side of the van approximately 15 inches (the side door of the van had been removed). When the van was traveling at approximately 35mph, approximately 5 pounds of lateral force was measured on the side of the tire, at the rear portion of the front wheel tire assembly.

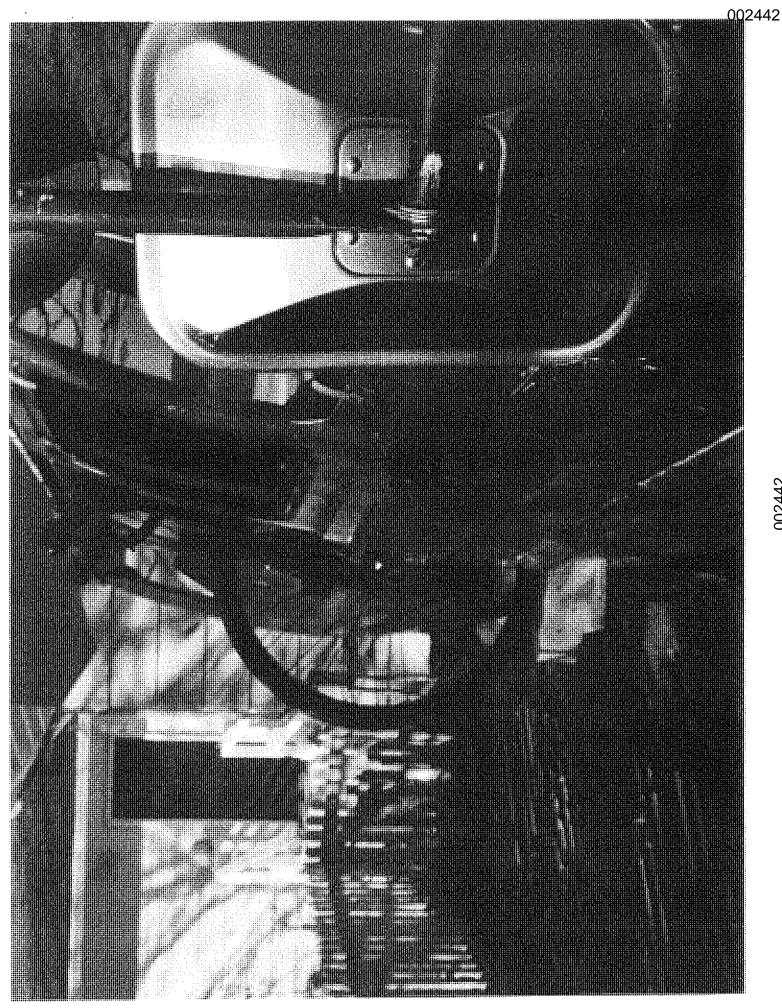
Handlebar Leverage Test: When the van was traveling at approximately 35mph, using a calibrated push/pull force gauge which was mounted between the left side of the handlebar (at two different locations) and the seat post, along the angle of the steering column, the force was measured at 10 pounds of force at 4 inches from the center of the stem and 5 pounds at 8 inches from the stem.

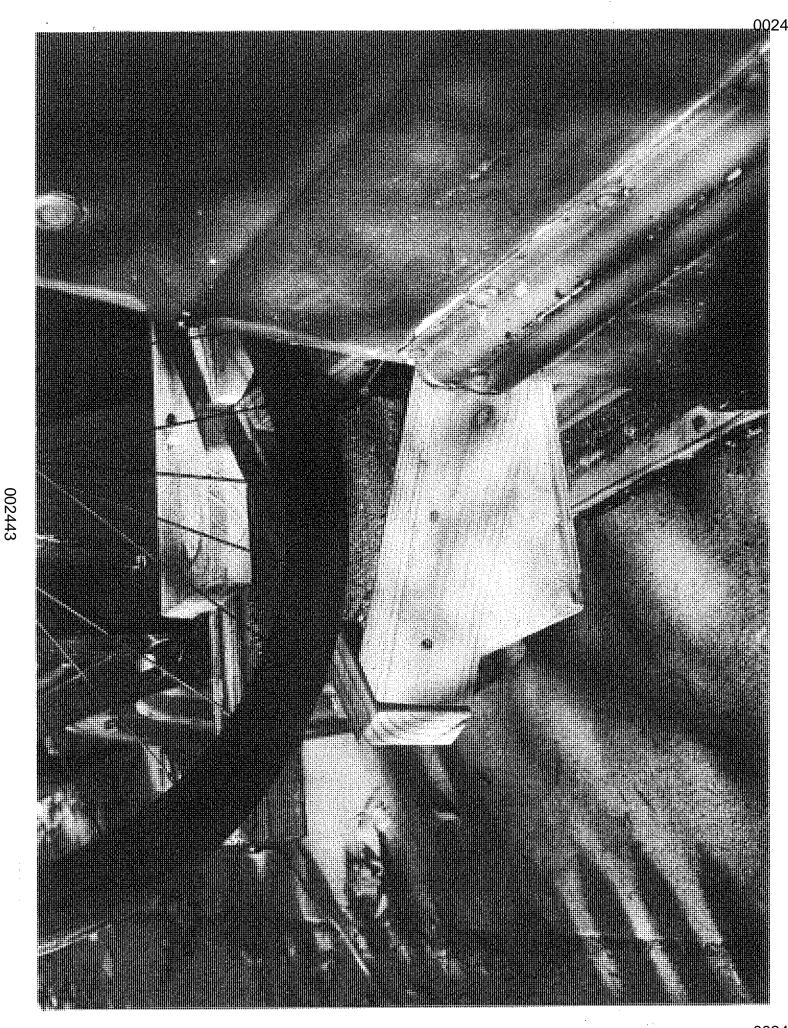
Additional Opinion: It is my opinion, that the Scott Racing bicycle that I used for my testing is substantially similar to the subject bicycle, and the results would be the same if the subject bicycle were used for same testing.

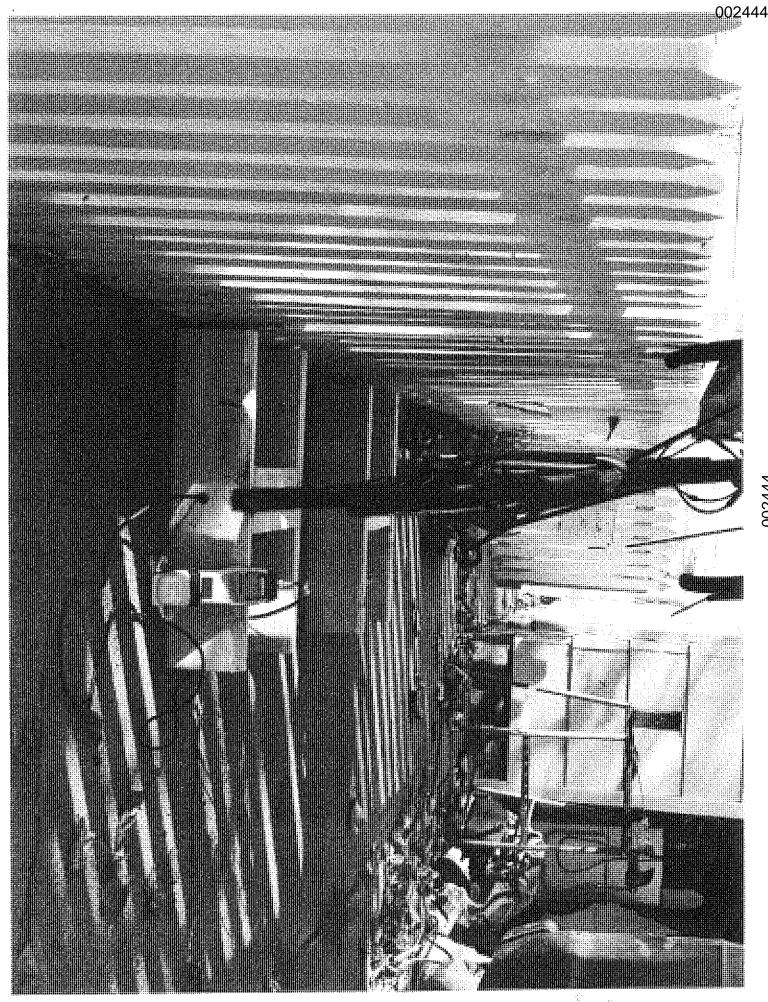
Respectfully submitted,

Alexander W. LaRiviere

Attached to this report are 6 photos depicting the methodology I used.







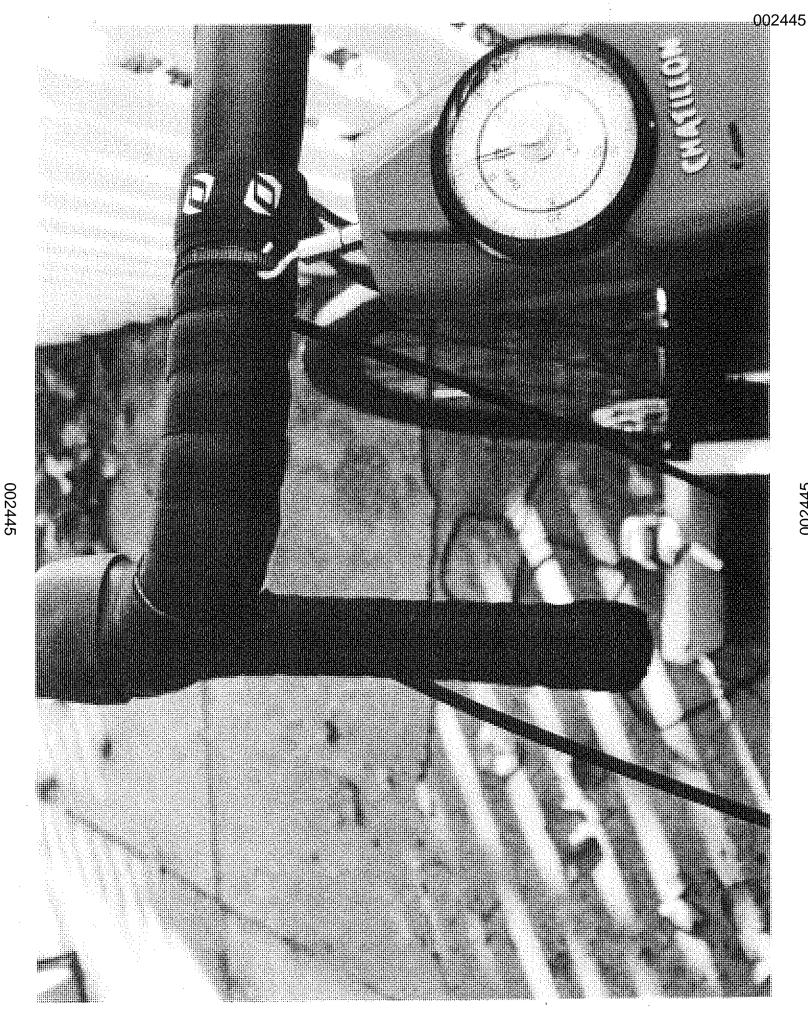




EXHIBIT 18

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DISTRICT COURT
1
                       CLARK COUNTY, NEVADA
2
3
     KEON KHIABANI and ARIA
     KHIABANI, minors by and
     Through their natural
4
     mother, KATAYOUN BARIN;
5
     KATAYOUN BARIN,
     individually; KATAYOUN
     BARIN as Executrix of the
6
     Estate of Kayvan Khiabani,
7
     M.D. (Decedent) and the
     Estate of Kayvan Khiabani,
8
     M.D. (Decedent),
9
               Plaintiffs,
                                       Case No.
                                       A-17-755977-C
10
          vs.
                                       Dept. No. XIV
11
     MOTOR COACH INDUSTRIES,
     INC., a Delaware
     corporation; MICHELANGELO
12
     LEASING, INC., d/b/a RYAN'S
     EXPRESS, an Arizona
13
     corporation; EDWARD HUBBARD,
     a Nevada resident; BELL
14
     SPORTS, INC. d/b/a GIRO
     SPORT DESIGN, A California
15
     corporation; SEVENPLUS
     BICYCLES, INC. d/b/a Pro
16
     Cyclery, a Nevada
     corporation; DOES 1 through
17
                                       VIDEOTAPE AND ZOOM
     20; and ROE CORPORATIONS 1
                                       VIDEOCONFERENCE
18
     through 20,
                                       DEPOSITION OF
                                       MICHAEL CARHART,
               Defendants.
19
                                       PH.D.
20
                    Tuesday, December 12, 2017
21
                     10:05 a.m. to 12:56 p.m.
22
           Pages 1 through 141, inclusive, Volume I
23
24
     Job Number 434820
25
```

```
Page 70
    bus manufacturer should reduce the drag coefficient,
1
 2
     if possible?
               Well, I -- I think there's a -- there's
3
          Α.
     probably a benefit with respect to fuel economy.
 4
          Q.
               So you --
          Α.
               Now -- now, that --
 6
               -- think --
 7
          Q.
               -- that might have to be balanced against
 8
     whether it still looks like what it needs to look
 9
     like in order to serve its function, if -- if it's
10
     geometrically consistent with what it needs to do.
11
     Things like that.
12
               So fuel economy and other reasons, you
13
     would agree that a manufacturer should reduce the
14
15
     drag coefficiency of their busses?
               They -- they could, to improve fuel
          Α.
16
17
     economy.
               And they should?
18
          Ο.
               They could.
19
          Α.
               Was there a reason they shouldn't improve
20
21
     fuel -- fuel economy?
                Well, again, to maintain the other
22
          Α.
     functions of the bus, coach, whatever it is.
23
                            Now, assuming for the sake of
                All right.
24
     argument that you could have reduced the drag
25
```

CARHART, PH.D., VOLUME I - 12/12/2017 MICHAEL

Page 71 coefficiency by a factor of 2, in other words, cut it 1 in half, would you expect that the air displacement 2 coming off the front of the bus would also be 3 reduced? Oh, I haven't done -- I haven't done the 5 calculation, but half of a pound is still -- is still 6 insignificant and trivial in the context of controlling a bicycle. 8 And when you say it's insignificant and 9 Q. trivial, you don't know what one half of a pound will 10 result in on the handlebar; is that right? 11 It's not exerted on the handlebar, sir. Α. 12 If you exert pressure on the tire, does it 13 0. not transmit the pressure to the right handlebar? 14 I -- I guess you're arguing some 15 Α. hypothetical where the -- the load is only on the 16 three o'clock position on the tire, and I'm just 17 having trouble with that. 18 So you think if there's air displacement 19 coming off the bus, it hits all of the tire equally 20 at all times? 21 Well, you -- you're arguing that it's 22 Α. somehow differentially affected, and I -- I don't --23 I don't see that basis. And -- and you need --24 Dr. Kato --25 Q.

```
Page 72
               -- cross-sectional area for the load to
1
     accumulate.
                  And I --
2
               That's what Dr. -- that's what Dr. Kato's
3
          Q.
     paper said that you agreed with a minute ago.
 4
               I -- I did not agree with your proposition.
 5
          Α.
6
     That this is a load exerted on a --
 7
          Q.
               But you're --
                -- portion of the --
          Α.
 8
 9
          Q.
               You --
               -- tire? You're -- you're -- you're just
10
11
     mixing up the words that he's got in his text.
               He isn't talking about load being applied
12
     to a portion of the bicycle tire. He's talking about
13
     a load in the outward direction on the bicycle and
14
     rider, and he's talking about a load in the inward
15
     direction. We evaluated those, Mr. Granat measured
16
     those. He evaluated their magnitude. They are
17
     small.
18
               Let me know when you -- you're done and
19
     I'll ask my next question.
20
21
          Α.
               I'm through.
                     So when you say it's insignificant
22
     and trivial, you can't tell -- tell me what you think
23
     would be significant and non-trivial in terms of an
24
25
     air blast.
```

Page 73 I -- I -- you know, I didn't take it up to 1 a destabilizing condition. We -- we evaluated loads 2 that were four and a half times through the rocket 3 engines what the disturbance is from the bus. Didn't -- didn't do anything. It was barely 5 I think what was percept --6 perceptible. Four and a half times ---- what was perceptible was the -- the 8 noise of the rocket firing, but in terms of the load, 9 I could barely perceive that. 10 Four and a half times what? Q. Okay. 11 Four and a half times the load levels 12 measured when the bus passed the cyclist, the -- the 13 ATD cyclist at 25 miles an hour. 14 One of which was two and a half? 15 0. That was inside 2 feet. 16 Α. So you're saying that you used this rocket 17 test to measure 4.5 times 2.5? 18 The majority of Mr. -- Mr. Granat's 19 observations were below 1, and the one that you're 20 focused on was on a very tight pass. 21 Well, the witness testimony is that the 22 0. bike was within 1 and 2 feet of the bus, right? 23 There's witness testimony all over the map. 24 There's witness testimony that the bus moved into the 25

F	Page 74
1	bike lane.
2	MR. KEMP: All right. Why don't we
3	take our first break.
4	THE VIDEOGRAPHER: Please stand by.
5	This will mark the end of video number one.
6	The time is 11:24 a.m. We are off the record.
7	(Off record, in recess from 11:24 a.m.
8	to 11:36 a.m.)
9	THE VIDEOGRAPHER: We are on the
10	record. The time is 11:36 a.m.
11	This marks the beginning of video number
12	two in the deposition of Michael Carhart, Ph.D.
13	Please begin when ready.
14	BY MR. KEMP:
15	Q. All right. Doctor, could we look back at
16	Exhibit 2, please, your December 6th, 2017, report.
17	A. I'm ready.
18	Q. Okay. And I'm interested in page 2 where
19	you say, quote, "The projections demonstrate a lack
20	of compression of the EPS foam liner in the region on
21	the left side of the helmet."
22	A. Right.
23	Q. What what does that mean?
24	A. Well, as I understood Dr. Stalnaker's
25	testimony, he opined that the helmet was overrun, and

EXHIBIT 19

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1
                          DISTRICT COURT
                     COUNTY OF CLARK, NEVADA
2
3
     KEON KHIABANI and ARIA
     KHIABANI, minors by and
     through their natural mother;
5
     KATAYOUN BARIN; KATAYOUN
     BARIN, individually; KATAYOUN
6
     BARIN as Executrix of the
7
     Estate of Kayvan Khiabani,
     M.D. (Decedent), and the
     Estate of Kayvan Khiabani,
 8
     M.D. (Decedent),
 9
                     Plaintiffs,
10
                                            Case No.
                vs.
                                            A-17-755977-C
11
     MOTOR COACH INDUSTRIES, INC.,
12
     a Delaware corporation, et al.
13
                     Defendants.
14
15
16
               DEPOSITION OF DAVID KRAUSS, PH.D., taken
17
               on behalf of Plaintiff, at 12777 West
               Jefferson Boulevard, Suite 300,
18
               Los Angeles, California, 9:17 a.m.,
               Thursday, November 9, 2017, before
19
               LINDA D. WHITE, Certified Shorthand
               Reporter Number 12009 for the State of
20
               California, pursuant to Notice.
21
22
23
     Job No.: 430147
24
     REPORTED BY:
     LINDA D. WHITE, CSR NUMBER 12009
25
```

Page 75 1 BY MR. KEMP: And the reason I think you said to have 2 proximity sensors is that in the case where there 3 are blind spots, it might alert the driver to a potential hazard, right? 5 Well, there are a lot of reasons for 6 Α. proximity sensors, right? One is kind of the blind 7 spot detector. Like I said, I've got the kind in my 8 wife's car when we pull into the garage and as we 9 approach that front wall, it beeps at us. 10 very useful. 11 Backing up, you're getting close to a 12 It beeps at you. Those are all proximity 13 vehicle. And depending what the maneuver is and 14 where they're located, they can be extraordinarily 15 useful. For this particular application, they don't 16 17 help. And this particular application we're 18 talking about is not running over Dr. Khiabani? 19 Preventing this particular accident, yes. 20 And in your report you indicate that this 21 Q. bus does have a blind spot of -- I think you said 22 Is that what you said? It's on Page 5, 23 52 inches. underneath Figure 1. 24 It's about a 40-inch -- oh, wait. 25 Α.

Page 76 1 with me. Hanq on. So that was at five feet out. You lose the 2 3 visibility of the bicyclist completely for about 40 inches. At three feet away you always have at least 5 6 partial visibility of a cyclist. And by partial visibility, you're talking 7 about the top of his head, a piece of the handlebar 8 or something? It could be something small like 10 Α. 11 That's how we define sightlines. And you need to bear in mind when you look at these. 12 If we take a snapshot, which I've 13 agree with you. actually done in the report here, and show kind of 14 what you're describing, you're absolutely right. 15 I mean, if you're riding along or you're 16 17 next to somebody and that's all you have continuously, I agree. That's not that useful. 18 when you're doing a visibility study and quantifying 19 sightlines, those count because it's dynamic. 20 21 So, for example, if you see the bike up ahead, you have that input that at some point, yes, 22 part of it's going to disappear. Maybe all you need 23 is a much smaller signal. 24 And that's really what we have is when 25

Page you're far back, you can see more of the bus. When 1 you pass the bus more -- or sorry -- pass the bike 2 more, you can see more of the bike through the 3 That's really what I'm getting at here is 4 mirrors. you have to quantify. You have to have a cutoff of 5 when it disappears for that reason. 6 So what you're saying is that -- is when the bike's five feet away from the bus, when the 8 front axle of the bicycle was between 6 and 46 9 inches from the front of the bus, none of the 10 bicycle was visible? 11 That's through windows and/or the Correct. 12 Α. 13 mirrors. So that would be a 40-inch blind spot at Q. 14 the right corner, basically? 15 A blind spot is universal, right? It's not 16 Α. just the right corner. It's when the bus is five 17 feet laterally separated from the bus to the right 18 of the bus. When it's between, again, six inches 19 and 46 inches from the front, you lose visibility of 20 the bus for that period of time. 21 22 You lose visibility of the bike? Q. Of the bike. Excuse me. 23 Α. Sorry. So given the fact you have this 40-inch 24

blind spot, you think you should have proximity

Page 78 1 sensors on the bus or that you should not have 2 proximity sensors? Well, again, a 40-inch gap here may sound 3 Α. material on the page, but let's just take passing a 4 Let's say, that we're passing at the same 5 bike. 6 13-mile per hour speed differential, 20 feet per second. (Reporter requests clarification) 8 THE WITNESS: We're going to cover 40 inches 9 and -- what is that -- about a quarter of a second. 10 BY MR. KEMP: 11 12 0. Uh-huh. So it's -- that's about a quarter of the 13 time of a typical glance to a mirror. So you may 14 look up and there may not be anything there, but it 15 will appear before you even have time to look away 1.6 from the mirror. 1.7 You do understand that the bus was 18 Okav. approaching an intersection at the time of impact? 19 I do. 20 Α. 21 Q. And usually when you approach intersections, you look left to the adjoining 22 traffic, the traffic that is coming in to you? 23 Not when there's a traffic signal, not 24 Α. 25 typically.

Page 79 1 So you just blow through the green and you Q. don't look to see whether people have actually 2 3 That's your practice? stopped? MR. RUSSELL: Objection. Foundation; relevance; 4 speculation. 5 Typically, the case is we put a 6 THE WITNESS: 7 lot of faith in our traffic signals. BY MR. KEMP: 8 So you don't think Mr. Hubbard should have 9 Ο. looked to the left to see if the other people were 10 obeying the red light traffic signal before he went 11 through the intersection? 12 So to the extent it had just turned red, 13 which I don't think we have any testimony on the 14 timing of the phasing, no. I mean, he was going 15 It was clear. Nobody was encroaching on 16 through. his path. He was right about that. And people 17 typically don't look left and right when they go 18 through a green light. 19 Well, actually, the training manual for the 20 bus company says he should look left and right when 21 he's going through a light. That's what they train 22 23 these people to do. That's fine. I'm not saying it's a 24 Α. Okav. bad practice. Saying typically when you study 25

Page 80 driver-looking behavior, you have a green and you're 1 going straight, you continue on doing that. 2 Okay. All right. So I think you said that 3 Q. 4 you don't know one way or the other whether the 5 J4500 has ever had proximity sensors or other blind spot detection capability, right? Α. Correct. Okay. Why don't we take a look at 8 Q. 9 Exhibit 6. Yeah. 10 Α. Okay. And this is a brochure for the current 11 Q. edition of the J4500, the 2017/2018 edition. 12 would ask you to look specifically at Page 21 where 13 it talks about specifications. You looking at 21? 14 15 Α. Getting there. Okay. And Item Number 2 is the Bendix wingman 16 Ο. advance system with adaptive cruise control and 17 collision mitigation functionality. And then the 18 second to the last item is the side-view cameras 19 integrated into the mirror head. Do you see those 20 21 two things? I do. 22 Α. Prior to today, did you know that 23 Okay. the current edition of the J4500 came equipped with 24 a wingman system made by Bendix that has collision 25

EXHIBIT 20

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1
                         DISTRICT COURT
                     CLARK COUNTY, NEVADA
3
     KEON KHIABANI and ARIA KHIABANI,
     minors by and through their natural)
     mother, KATAYOUN BARIN; KATAYOUN
 5
     BARIN, individually; KATAYOUN BARIN)
 6
     as Executrix of the Estate of
     Kayvan Khiabani, M.D. (Decedent),
     and the Estate of Kayvan Khiabani,
     M.D. (Decedent),
 8
                       Plaintiffs,
                                         ) Case No.
                                         )A-17-755977-C
 9
     vs.
                                         )Dept. No.
10
                                          )XIV
     MOTOR COACH INDUSTRIES, INC., a
11
     Delaware corporation; MICHELANGELO )
     LEASING, INC. d/b/a RYAN'S EXPRESS,)
12
     an Arizona corporation; EDWARD
     HUBBARD, a Nevada resident; BELL
13
     SPORTS, INC. d/b/a GIRO SPORT
     DESIGN, a California corporation;
     SEVENPLUS BICYCLES, INC. d/b/a
14
     PRO CYCLERY, a Nevada corporation;
     DOES 1 through 20; and ROE
15
     CORPORATIONS 1 through 20,
16
                       Defendants.
17
18
          VIDEOTAPED DEPOSITION OF VIRGIL HOOGESTRAAT
19
                        LAS VEGAS, NEVADA
20
21
                    FRIDAY, OCTOBER 13, 2017
22
23
     REPORTED BY: HOLLY LARSEN, CCR NO. 680, CA CSR 12170
24
                   JOB NO.:
                             425410
25
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Page 48 And by "spray pattern," you're just 1 basically looking at where that goes? 2 Correct. Α. Okay. Does that really have anything to do with aerodynamics? 5 But, I mean --I didn't think so. Okay. All right. Now, Item Number 4 asked 7 for the general parameters of the design or 8 engineering for right-side visibility for the time 9 period 1997 to 2016. Do you see that one? 10 11 Α. Yes. What were the general parameters 12 Okav. limited to the E series and the J series? 13 At that time, we did a computer model that 14 we'd look and we'd locate the eye in the driver's 15 And from that eye, get the view that the 16 driver would see. There was studies done in that 17 There's no records of those studies because 18 regard. they were studies. 19 20 Okay. Are those called line of sight or visibility optimization studies or something like 21 22 that? Well, we called them line of sight. 23 would show you what you could see from the driver's 24 You would locate the driver's eye and you 25

would look out as far as what the -- particularly 1 the windshield and the wiped area and the defrost 2 area and those kind of things are clear. 3 When you do the line-of-sight study, how do Q. you account for the fact that drivers are different 5 sizes and they put their seats in different 6 adjustment --There's SEE guides on the 5 percentile, the Α. 50 percentile, to 90 percentile. You try to move 9 10 the eye relative to those. So you think there was computer modeling 11 Q. done for the E series and the J series? 12 It was not done for the J series. I think 13 it was done for the E series because that would be 14 15 common practice. Okay. And so the computer modeling in 16 Q. general was done to try to see what the driver would 17 see with regards to, in this case we're talking 18 about right-side visibility? 19 In this particular case, what he would see 20 Α. looking through the windshield to the mirror and 21 down to the right-side visibility. 22 And you said you don't think the computer 23 modeling exists as we sit here today? 24

I have found no records of it.

25

Α.

But back

Page 52 scenario where it's all glass. 1 Let's go to a real J4500. 2 Q. 3 Α. Let's go real world. Okay. Q. If that's all right. And, yeah, it will --5 Α. it is a blind spot. Although because the driver is 6 7 quite a ways away from it, the angle is very narrow for the right-hand A pillar. But an A pillar in all 8 vehicles creates somewhat of a blind spot. Okay. And what about -- between the window 10 Q. 11 and the bottom of the side of the bus there's something called a sill we've heard it referred to? 12 The sill divides the window on the right side from 13 14 the bottom. What do you call that? 15 Α. You can call it anything you want. be called a sill. 16 So the solid structure, if it is 17 Okay. Q. solid, of the bus, under the window from the sill on 18 down, that would also be a right-side obstruction? 19 Α. 20 No. Why not? 21 Q. Because when the driver is driving the bus, 22 his number one thing is to look out the windshield 23 24 to see where he's going. 25 Q. Okay.

1	Page 61 is this a computer model, or what is this?
2	A. Both.
3	Q. So computer models were done for the J
4	series?
5	A. No. I said they were not.
6	Q. Were not. Yeah, that's what I thought you
7	said.
8	A. Previously I said they were not.
9	Q. Okay. So the only computer model is the
10	one for the E series that no records exist for?
11	A. I presume they were done because that's our
12	standard practice.
13	Q. So when you said they were done, you
14	think you don't know for an actual fact that they
15	were done. You think they may have been done. Is
16	that fair to say?
17	A. I cannot tell you that they were done
18	because I have found no records of them because we
19	don't keep records of study. I'm saying it's just
20	their standard practice.
21	Q. When you say "their standard practice,"
22	you're referring to MCI's standard practice or bus
23	manufacturers in general or what?
24	A. Bus manufacturers in general would look
25	do look into that.
5	

Page 79 retrofit on the whole brake control system. Again, 1 you still have the engine communication system 2 issue. 3 Do you know, as we sit here, whether or not Q. the WABCO system could be retrofitted to the 5 pre-2014 J series? 6 I mean, if you replaced the engine, replaced the whole brake control system, and 8 replaced the instrument panel and replaced all 9 that --10 Why would you have to replace the brake 11 Q. 12 system? The brake control system. 13 Α. 14 Q. Okay. If you replaced all -- the whole electrical 15 Α. system, the brake control -- I mean, it's a bus. 16 you took everything out of it down to the frame and 17 started over, you could probably do it. 18 That would be expensive I assume? 19 Q. Okay. MR. RUSSELL: Objection. Foundation. 20 It would far exceed the value THE WITNESS: 21 22 of the bus. BY MR. KEMP: 23 Was there any consideration to using 24 Okay. a proximity sensor that did not include brake

Page 80

- 1 involvement prior to 2014?
- 2 A. Not that I'm aware of.
- 3 Q. And are you aware that there are retrofit
- 4 kits on the market for proximity sensors that will
- 5 purportedly give you some sort of warning of side
- 6 collisions?
- 7 A. There's a lot of aftermarket kits for
- 8 various things out there.
- 9 Q. Okay. And do you know whether there's an
- 10 aftermarket kit for proximity sensors that would
- 11 serve as some sort of warning of side detection?
- 12 A. I'm sure there is. There's a lot of kits
- 13 for various things out there.
- 14 Q. Okay. And has MCI investigated those?
- 15 A. Well, today MCI has a 360-camera system
- 16 that it offers. It also offers a camera in the
- 17 mirror.
- 18 Q. Okay. Before we get to that, let's talk
- 19 about the off-market kits that we were talking
- 20 about. Did MCI investigate whether or not to use
- 21 any of those?
- 22 A. Not that I was involved in.
- Q. Okay. And, in theory, that type of
- 24 off-market kit could be retrofitted to a J series
- 25 bus and at least have a warning feature if not an

Page 85 moved out of the way of the rear tires? 1 There was several scenes that they had put 2 3 together and I don't recall that one, but it could have been there. Okay. Let me ask it a little differently. 5 0. 6 Do you recognize that there's a theoretical 7 potential that pedestrians or bicyclists could potentially be run over by rear tires of a bus under 8 9 some scenarios? There may be a scenario where that could 10 Α. 11 occur. And generally -- you understand 12 Q. Okay. 13 generally that that could happen under some 14 scenarios? It's possible that that could happen. 15 Α. 16 Okay. And basically bus manufacturers have Q. 17 always known that? MR. RUSSELL: Objection. Foundation. 18 19 Outside the scope. THE WITNESS: Have always known what? 20 21 BY MR. KEMP: Well, let's put it differently. You knew 22 back in, let's say, 2000 that this was a potential 23 scenario? 24 There's a potential that a bus tire can 25 Α.

1	Page 106 Q. Okay. Has there been any consideration
2	made to making a more extensive fender for the
3	J4500?
4	A. I don't know what that means.
5	Q. Have you seen buses that they have the wall
6	just cover the entire or coaches, excuse me,
7	cover the entire rear wheel section with surface
8	material?
9	A. Coaches?
10	Q. Yeah.
11	A. I've seen transit buses.
12	Q. Okay. You've seen transit buses like that.
13	A. I have not seen coaches.
14	Q. Okay. And what do you call a transit bus
15	when it does that?
16	A. I don't know.
17	Q. Have you heard the term "spat"?
18	A. You can call it that, I guess, if that's
19	what they call it.
20	Q. Have you heard that term?
21	A. I've heard the term "spat."
22	Q. Okay. And what does that mean to you?
23	A. It's just the decorative closeout over the
24	tires, tire area.
25	Q. And would I be correct that spats preclude

Page 107 humans from coming into contact with the tires to a 1 2 greater extent than the fender on a J4500 would? 3 MR. RUSSELL: Objection. Foundation. THE WITNESS: I don't know that. I don't 5 see why it would. BY MR. KEMP: 6 7 Okay. If you have a person next to a Q. J4500, there's basically no barrier between the 8 9 tires and the person; right? 10 Certainly the tires are exposed if that's Α. 11 what you mean. Yeah, the tires are exposed. And in the 12 0. transit bus with spats, the tires are not exposed; 13 14 right? 15 Yeah, part of the tire is not exposed. Α. Okay. And by -- basically there's 3 or 16 17 4 inches of the tire exposed. That's it; right? I don't know the exact dimension. 18 Α. part of the tires are exposed. 19 Has there been any consideration given to 20 making the fender of the J4500 larger or more 21 encompassing so less of the tire's exposed? 22 23 Α. In a motor coach, we can't do that. 24 0. Why is that? A motor coach has tremendous -- is used in 25 Α.

EXHIBIT 21

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1
2
3
5
                             DISTRICT COURT
 6
                         COUNTY OF CLARK, NEVADA
                                  -000-
8
9
     KEON KHIABANI and ARIA
     KHIABANI, minors by and
10
     through their natural mother
11
     KATAYOUN BARIN, et al.,
                                      Case No. A-17-755977-C
                  Plaintiffs,
12
                                       Department No. XIV
13
     vs.
     MOTOR COACH INDUSTRIES, INC.,)
14
     a Delaware corporation;
     MICHELANGELO LEASING, INC.,
15
     dba RYAN'S EXPRESS, an
     Arizona corporation, et al.,
16
                  Defendants.
17
18
19
                        VIDEOTAPED DEPOSITION OF
20
                              MARY WITHERELL
                              AUGUST 24, 2017
21
                              RENO, NEVADA
22
23
            REPORTED BY: AMY JO TREVINO, CCR #825, CSR #5296
24
                                JOB NUMBER 411087
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MARY WITHERELL - 08/24/2017

1	Q	Page 37 What kind of car do you have?
2	A	A Toyota Highlander.
3	Q	And if I told you that since 2000 there has been
4	proximit	y sensors in Mercedes that can detect whether a car is
5	in front	of you at a certain range, would that surprise you?
6		MR. ROBERTS: Objection, foundation.
7		THE WITNESS: Not with a Mercedes. I know new cars
8	have lar	ne detection in front, but
9		MR. KEMP:
10	Q	And when you were at Ryan's Express, did anyone at
11	Ryan's E	Express design buses?
12	A	Not that I'm aware of.
13	Q	Did they make buses?
14	А	No, sir.
15	Q	Was MCI one of the companies that provided buses to
16	Ryan's I	Express?
17	A	Yes, sir.
18	Q	Are you familiar with an MCI, model of an MCI bus
19	called a	a J-4500?
20	A	Yes, sir.
21	Q	And is it your understanding that MCI made that
22	particu:	lar bus?
23	A	Yes, sir.
24	Q	Did you expect that MCI would design its buses in a
25	reasonal	bly safe manner?
1		

MARY WITHERELL - 08/24/2017

1	7\	Page 38
1	A	Yes.
2		MR. ROBERTS: Objection, form, foundation.
3		MR. KEMP:
4	Q	Go ahead.
5		MR. ROBERTS: You can answer, that's just for the
6	court la	ater on to rule on.
7		THE WITNESS: I would assume, yes.
8		MR. KEMP:
9	Q	And why so?
10	A	Just because it's a mode of transportation, just like
11	all the	car companies and everything.
12	Q	And have you seen buses with proximity sensors?
13	А	I have not, no.
14	Q	And if I told you Volvo was making buses with
15	proximi	ty sensors, would that refresh your recollection in any
16	way?	
17	А	Well, we had a couple of Volvos, but I don't recall
18	that the	ey had proximity sensors on them.
19	Q	Do you think a proximity sensor based on your
20	experie	nce with buses would be a good safety feature for a bus?
21		MR. FREEMAN: Objection, foundation.
22		THE WITNESS: My opinion, my personal opinion yeah, it
23	would be	e a good idea.
24		MR. KEMP:
25	Q	Why is that?

Page 50 mini buses. But basically I think that was it. 1 So quite a few different brands you have driven? 2 Yes, sir. And are you familiar with the standard of quality in the motor coach industry? 5 Yes, sir. Α б Did you ever feel that the MCI J-4500 that you used to drive was unsafe as compared to other manufacturers' motor 9 coaches? No, sir. 10 Mr. Kemp talked to you about visibility. Did you ever 11 feel that you couldn't see enough in order to drive safely and 12 avoid pedestrians and bicyclists and other motor vehicles? 13 The older MCI, I know the mirrors you had more blind 14 spots than the newer MCIs. But every bus you still, you can't 15 just sit there, you got to move your head. 16 Okay. And even though you had never heard rock and 17 0 roll, we got a video here, and you know that you moved your 18 19 head back and forth to make sure --Right, you can't just sit stationary. You got to move 20 to look. 21 That you are looking around blind spots or 22 23 obstructions? And the right side is the worst side. 24 Do you remember about what year of manufacturer you 25 0

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cities it would be a good idea to have all cars have seatbelts?
1
2
              Yeah.
              Same for air bags?
3
        Q
        Α
              Yes.
              Same for proximity sensors?
5
        Q
              I think the -- right now is it required?
         Α
6
    Personal opinion, should, you know, maybe they be on buses,
    yes, but I can't speak other than that personal opinion.
8
              Okay. And the reason you have that personal opinion
9
         Q
     is, as you already said, the right side is the quote, worst
10
     spot for blind spots, right?
11
              Correct. Yes, sir.
12
         Α
              MR. ROBERTS: Objection, foundation.
13
              MR. KEMP:
14
              And that's based on your years as a bus driver and a
15
         Q
     bus safety analyst, it's your opinion that the right side of
16
     the bus is the worst spot for blind spots, correct?
17
              Correct, and also just as a CDL driver.
18
              And by worst spot, do you mean less visibility on the
19
     right side than any other area?
20
              You have more blind spots on the right side than you
21
     do on the left.
22
              So if you are going to put -- if you were going to put
23
     a proximity sensor on one side or the other, it should be on
24
     the right side certainly in your opinion?
25
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	Page 58
1	A In my opinion, yes, sir.
2	Q Now, we talked about the MCI J-4500, and I believe
3	Mr. Roberts misspoke, or someone misspoke, saying it didn't
4	come out until 2010 or something like that. It actually came
5	out in the year 2000. Are you aware of that?
6	A I don't recall exactly but sounds reasonable.
7	Q But in your view the older MCI, whatever that means,
8	had a problem because the mirror had more blind spots; is that
9	correct?
10	MR. ROBERTS: Objection, form.
11	THE WITNESS: It was the blind spot based on where it
12	was positioned you had spots to the front, more blind spots,
13	yes.
14	MR. KEMP:
15	Q And that would be the older MCI; is that correct?
16	A Yes, sir.
17	Q And as we sit here today do you know whether or not
18	the 2008 MCI was what you would consider an older MCI?
19	MR. ROBERTS: Objection, form and incomplete.
20	THE WITNESS: It was older than 2008.
21	MR. KEMP:
22	Q Are you aware of what's commonly called a European
23	mirror that comes from the top down as opposed to from the side
24	of the bus up?
25	A On the Setras, like the Setras look like

```
Page 60
              Just my personal opinion, sir, yes.
1
         Α
              And so just to make sure this is real clear on the
2
     record, in your personal opinion the Setra, with the overhead
3
    mirrors has less right side blind spots than a J-4500; is that
     correct?
 5
              In my personal opinion, yes, sir.
              So if the only factor was right side visibility, you
     would prefer a Setra over a J-4500?
 8
              MR. ROBERTS: Objection to form.
 9
                            Personally, yes, sir.
10
              THE WITNESS:
              MR. KEMP:
11
              And we alluded to one of the potential criticisms of
12
     the overhead mirror is that some drivers aren't familiar with
13
     it, and they might bump into things going in and out of the
14
     yard; is that fair to say?
15
              Yes, sir.
         Α
16
              But if you are a good driver that's not a problem,
17
         Q
     right?
18
              Yes, sir, but sometimes, you know, space requirements
19
     getting that bus in, you know, with the posts and pillars and
20
     you just got to be on your game.
21
              Okay. Well, you got to be on your game anyway,
22
         0
     because you are a common carrier, right?
23
               Correct.
24
         Α
               Okay, and speaking about common carrier, Ryan's was
25
         Q
```

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Page 65
1
     should be doing.
              And what did you mean when you say you are trying to
3
     get over?
              If you can maneuver over, because even if you got
     three feet, I mean if you can change the lane, that's the best,
 5
6
     but you know.
                                    Thank you, ma'am.
 7
              MR. ROBERTS:
                            Okay.
     further, Will.
 8
 9
                               EXAMINATION
10
11
              BY MR. KEMP:
12
              Okay, just briefly. You said that you didn't think
13
     the J-4500 blind spots were, in Mr. Roberts words, unreasonably
14
     unsafe, unquote. Okay, do you remember that testimony?
15
         Α
              Yes, sir.
16
              But they can be improved upon, right?
17
              Yes, sir.
18
         Α
              And is there any reason why you shouldn't be as safe
19
     as possible whether you think -- I'm not sure I know what you
20
     mean by unreasonable, but is there any reason in your mind why
21
     you shouldn't be as safe as possible?
22
              Well, you would hope everybody is as safe as possible.
23
         Α
              Now, with regards to the right side blind spot of a
24
         0
     J-4500, would I be correct that the closer you get to the
25
```

1	bicycle v	Page 66 when you are overtaking it, the more of a problem the
2	blind spo	ot becomes?
3	A	As you are overtaking there will be a spot where you
4	are going	g to really have to adjust and look, yes.
5	Q	So the closer you get, the more of a problem the blind
6	spot pote	entially becomes on a J-4500; is that correct?
7	A	Well, it's any bus, sir, it's not just the J-4500.
8	Q	But the closer you get to that bicyclist, the more of
9	a problem	m the blind spot becomes in terms of visibility, right?
10	A	Well, you have got to pay more attention.
11	Q	Because the it becomes a bigger problem in terms of
12	visibili	ty, correct?
13	A	Correct.
14	Q	And would I also be correct that when you are 400 feet
15	behind a	bicyclist or 350 or 250, it's hard to determine
16	whether	you will be two feet, three feet, four feet within that
17	bicyclis	t when you go past him?
18		MR. ROBERTS: Objection to form.
19		THE WITNESS: It's hard to distinguish how close you
20	are goin	g to be?
21		MR. KEMP:
22	Q	Right.
23	A	Not if you are using, you know, the markers on the
24	bus, you	should know how far you are from.
25	Q	Okay. So you think if you are 400 feet away from a

EXHIBIT 22

Press Releases

PRESS RELEASE

Model Overview: 2008 Volvo S80

Jun 04, 2007 | ID: 11653

Manufacturer's Suggested Retail Price

S80 3.2: \$38,705

\$80 T6 AWD: \$42,045 \$80 V8 AWD: \$49,210

Destination: \$745

All new last year, the acclaimed Volvo S80 gains an exciting new dimension in performance for 2008 with the introduction of the turbocharged T6 AWD. This revolutionary new model fits perfectly between the normally aspirated S80 3.2 and the flagship S80 V8 AWD.

Based on the S80's compact 3.2-liter 235-horsepower inline-6 cylinder engine, the T6 version has a displacement of 3.0 liters, producing 281 horsepower and 295 lb.-ft. of torque. Maximum torque is on tap from just 1,500 rpm and remains available all the way up the rev range, resulting in remarkably quick acceleration and smooth drivability.

The somewhat smaller cylinder displacement of the T6, owing to slightly narrower cylinder bore and shorter stroke, is compensated by a single turbocharger with twin-scroll technology. This takes in exhaust gases in two stages with inflow divided into lots of three cylinders each. Thus, the T6 permits the use of a more compact and simplified turbo that provides extremely swift response with the lowest possible fuel consumption and exhaust emissions.

Like the S80 V8, the T6 is fitted with Volvo's All Wheel Drive with Instant Traction. Using an electronically controlled hydraulic clutch, the system distributes drive between the front and rear wheels to ensure the best possible road grip in all situations. All S80s feature a standard six-speed "Geartronic" transmission.

Volvo's first V8-powered sedan continues to put out 311 horsepower and 325 lb.-ft. of torque. Changes to the S80 V8 include more standard premium features with bright taillight trim, brushed aluminum lower door side moldings, Classic Wood inlay center console and soft feather seating surfaces. The world first Personal Car Communicator (PCC) is now standard on the S80 V8 and remains optional on other variants.

In nearly every area of occupant protection the S80 expands Volvo's leadership in both preventative and protective safety. Innovations include a side airbag with dual chamber construction for enhanced hip and chest protection. Clever structural design employs four different grades of steel for predictable crash energy absorption. The S80 also features the next generation of WHIPS rear impact protection and new approaches to pedestrian safety.

Adaptive cruise control, optional on all S80s, uses a radar sensor to measure the distance to vehicles ahead and automatically adjust vehicle speed. Collision warning with brake support works in concert with the system, alerting the driver and applying the brakes if needed. The Blind Spot Information System (BLIS) is another high-tech option. Cameras near the outside mirrors detect vehicles that might be in a blind spot and relay the information to the driver.

On the inside, the S80's cabin is fitted with a super-slim center console, premium leather seating surfaces and real wood inlays. A power driver's seat with memory, power font passenger seat and power sunroof is among the list of standard amenities. Also included is a high performance sound system with 6-disc CD changer, auxiliary input, MP3 capability, a 160-watt amplifier and eight speakers.

All models can be enhanced with the optional Dynaudio Package that adds a 650-watt amplifier, Dolby Pro-Logic II Surround Sound and 12 Dynaudio® speakers. Rear seat headphone jacks and audio controls are new this year. Sirius Satellite Radio is also included. Other options include the Volvo Navigation System with HDD, DVD map data and remote control and a dual screen rear seat entertainment system.

Keywords:

2008, S80 (2008-2016)

Descriptions and facts in this press material relate to Volvo Car Group's international car range. Described features might be optional. Vehicle specifications may vary from one country to another and may be altered without prior notification.

(/us/enus/download/11653/doc/doc/)

EXHIBIT 23

Pedestrian Detection in Transit Bus Application: Sensing Technologies and Safety Solutions

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Abstract—Redestrian safety is a primary traffic issue in urban environment. The use of modern sensing technologies to improve pedestrian safety has remained an active research topic for years. A variety of sensing technologies have been developed for pedestrian detection. The application of pedestrian detection on transit vehicle piatforms is desirable and feasible in the near future. In this paper, potential sensing technologies are first reviewed for their advantages and limitations. Several sensors are then chosen for further experimental testing and evaluation. A reliable sensing system will require a combination of multiple sensors to deal with near-range in stationary conditions and longer-range detection in maying conditions. An approach of vehicle-infrastructure integrated solution is suggested for the pedestrian detection in transit bus application.

Index Terms- Pedestrian detection. Vehicle infrastructure integration, Transit bus, Radar, Laser scanner

I. Introduction

Pedestrian safety is a primary traffic issue in urban environment. A glance of national crash statistics [1] shows that about 15 % (4,882 out of 42,116 in 2001) of fatalities result from pedestrian-type accidents. The California statistics compiled by Office of Traffic Safety (OTS) and California Highway Patrol (CHP) {2, 3] also reflect a significant numbers of pedestrian incidents with 689 out of 3,730 fatalities in the year of 2000 in all collisions being pedestrians. Even though the percentage of these accidents may not be the highest among all categories of accidents or collisions, these incidents represent a considerable hazard to the public since they often involve severe injuries or fatalities of pedestrians. It is therefore a great incentive to deploy modern sensing technologies to assist drivers in identifying the presence and movements of pedestrians.

The detection and prevention of pedestrian accidents is not trivial, to say the least. First of all, in urban traffic environment the patterns of vehicle and pedestrian movements are very complicated. On city streets, there are numerous locations where pedestrians may choose to cross in front of vehicle trajectories suddenly. Modern sensing technologies have not matured to the extent that can provide the solution for a reliable and an accurate means of identifying pedestrians in urban traffic environment with a cluttered background and a range of visibility under various weather and roadway conditions. A more pragmatic approach for the field deployment of nedestrian detection technology will be to target a specific

application or scenario where an integrated system approach can play an important role.

Pedestrian defection for transit bus has the potential to be deployed in the field in the near future. First, transit buses encounter a large volume of pedestrian traffic in their routes, bus stops, and intersections. Second, accidents involving transit buses are compounded into transit operational and cost problems and impact on mobility and efficiency. Third, transit buses run on pre-known routes and are primary candidates to integrate infrastructure and vehicle-based solutions. Finally, transit buses are higher-priced vehicles and thus can be initial candidates for advanced technology solutions with minimum cost impact.

Even with the advancements of sensing technologies, the applicability of a single type of sensor for different operating conditions remains doubtful. In this paper, a technology review is provided first in Section II for the potentially applicable sensing technologies. Promising candidate sensors for transit bus application is further investigated through experimentation in Section III. A vehicle infrastructure integrated (VII) approach is suggested in Section IV and Section V provides a summary and conclusion for the paper.

II. SENSOR TECHNOLOGIES REVIEW

Different sensing technologies such as piezoelectric sensor, ultrasonic sensor, microwave radar, laser scanner and computer vision can be used for pedestrian detection. The review in this section will examine different technologies used for pedestrian detection and analyze their advantages and limitations.

A. Piezoelectric Sensor

For the application of pedestrian detection, piezo-cables with piezoelectric material are usually fabricated into a "mat". When a person steps onto the mat, electrical signal is generated until the person leaves the mat. Piezoelectric detectors are used to detect the presence of waiting pedestrian at a controlled road crossing for PUFFIN (Pedestrian User-Friendly Intelligent Crossing) and PUSSYCATS (Pedestrian Urban Safety System and Comfort at Traffic Signals) [4].

Piezoelectric detector is a simple reliable sensor for pedestrian detection. It does not require complex signal processing. However, it does require physical contact between the pedestrian and the sensor mat. Therefore, piezoelectric detector is usually used for the intersection pedestrian crossing.

B. Ultrasonic Sensor

Ultrasonic detectors emit ultrasonic wave. When vehicles or pedestrians pass by, the transmitted sound wave is reflected back to the receiver. Based on the reflected signal, objects can be detected for their presence along with their distance and speed. There are two basic types of ultrasonic sensors depending on the waveform of ultrasonic wave [5]. Pulse ultrasonic sensors measure the distance or presence of objects by sending a pulsed ultrasonid wave and then measuring the flight time of reflected sound echo. Continuous wave ultrasonic sensors output continuous ultrasonic wave of certain frequency and use Doppler principle to detect moving object and its speed.

Ultrasonic detector can detect objects up to 30 feet. The limitations of ultrasonic sensors can be summarized as follows [6, 7]. First, in order to minimize lost bounced back ultrasound energy from target, the preferred installation configurations are either directly facing downward (i.e. nadir incidence angle) above targeting area or aiming from a horizontally mounted side viewing position (side fired). Second, clothing has some effects on pedestrian detection. Usually, clothes made of natural fiber are more absorbent to sound wave than clothes made of synthetic fiber. Therefore, pedestrian wearing synthetic fiber (e.g. nylon) is easily detected compared with pedestrian wearing natural fiber (e.g. cotton). Finally, weather conditions change like temperature, pressure, humidity and wind will affect the performance of ultrasonic sensors. This is because the speed of sound varies according to temperature and pressure of the medium.

C. Microwave Radar

Microwave radar works in a way very similar to ultrasonic sensors. In stead of sound wave, electromagnetic wave is transmitted from microwave radar antenna. Based on the analysis of bounced back signals, objects can be detected together with their distance and speed.

Microwave radars can be classified into different categories based on the transmitted electromagnetic wave form. Doppler radar transmits a continuous wave of constant frequency. Such electromagnetic wave, when reflected from a moving object, will have frequency shift. By analyzing the frequency shift, the speed of object can be calculated. Doppler radar alone can only detect moving object with relative speed larger than certain threshold. Another type of microwave radars transmit frequency-modulated or phase-modulated signal, for example a type of radar sensor is based on frequency modulated continuous wave (FMCW) technology [8]. The distance to target is determined by time delay of the return signal. Ultra wide band (UWB) radar is a new emerging technology which has great potentials in ITS application [9]. The basic concept is to transmit and receive an extremely short pulse of radio wave, The resultant waveforms are extremely broadband. The precision timing of pulses inherent to UWB radar, and the successful development of advanced timer technology has enabled UWB radar capable of detection, ranging and motion sensing of personnel and objects with centimeter precision.

Radar sensors can provide accurate object distance and speed without complex signal processing (compared with computer vision). Radar technology can operate in different environmental conditions (e.g. bad weather, poor visibility or harsh environmental impacts like ice, snow or dust coverage). If installed on the vehicle, it can be hidden behind un-shielding materials with no influence on vehicle's appearance and thus does not disturb vehicle design. To further differentiate detected objects, (e.g. pedestrians or other traffic participants) the power spectral density characteristics of reflected signal can be analyzed [10].

D. Laser Scanner

· Another technology that has been evaluated for pedestrian and object detection is a Laser scanner, such as a high-resolution laser range finder [11]. The laser scanner emits infrared laser pulses and detects the reflected pulses. The measurement principle is based on the time-of-flight method. Scanning of the measurement beam is achieved by rotating prism and covers a viewing angle of up to 360 degree. The original data from laser scanner is much like vision image data in the horizontal scanning plane with accurate distance (centimeter level) and azimuth angle information (from 0.25 degree to 1 degree depending on scanning frequency). Therefore a procedure similar to image processing can be applied here. In [26], multiple laser scanners connected by LAN are used to track pedestrians in a given area. For the application on vehicles, vehicle model is setup to compensate vehicle motions [12]. In order to compensate vehicle pitch motion, multilayer laser scanner with more than I scanning plane is designed [5].

The excellent range accuracy and fine angular resolution make laser scanners suitable for applications in which a high resolution image of surrounding is required. However, since they are optical sensors, different weather conditions like fog or snow will limit their detection range. The signal processing is a little more complex for laser scanner compared with ultrasonic or microwave radar, therefore dedicated CPU may be needed.

E. Computer Vision

Vision based pedestrian detection is a natural choice based on the human's own experience. Although video camera can obtain very rich information about the surrounding environment compared with the radar or laser scanner, the image sequences can not be used for anything directly without further interpretation. Different algorithms are proposed to detect pedestrians in the image sequences acquired from video camera. Recent research shows two main trends. Motion based approaches take into account temporal information and tries to detect the periodic features of human gait in the movement of candidate patterns. On the other hand, the shape based approaches rely on shape feature to recognize pedestrians.

Motion based approaches uses rhythmic features or motion patterns unique to human being. Although motion based approaches provide an efficient way to reduce the number of false positive candidates, there are several limitations on motion based approaches. First, motions based schemes cannot detect stationary pedestrians obviously or pedestrians in

unusual movement like jumping. Second, the pedestrian's feet or legs should be visible in order to extract rhythmic features or motion patterns. Third, the recognition procedure requires a sequence of images, which delays the identification until several frames later and increases the processing time.

Shape based methods allow the recognitions of both moving and stationary pedestrians. The primary difficulty associated with this approach is how to accommodate the wide range of variations in pedestrian appearances due to pose, various articulations of body parts, lighting, clothing and occlusion. The key issues here are: first, find a concise yet sufficient human shape feature representation. Second, maintain a balance between accuracy of detection and processing time. To achieve real-time processing, trade-off has to be made between accuracy of classification and processing time. Two step pedestrian approaches are used to relieve such computational burden in [14-18]. Usually a coarse segmentation sten is carried out first to separate foreground and interesting region from background. Distance measurement from stereo vision can be used for segmentation step. The fine analysis of separated foreground objects is then followed to check for the presence of pedestrians.

Although shape based method is more general, the major drawbacks associated with shape method are, 1) high false positive rate due to variation of human shape and changing lighting conditions, 2) heavy computation burden when performing feature matching. Different approaches are proposed to resolve these drawbacks. In [19], the single frame shape match is combined with notion analysis to reduce false positive rate. A specialized system-on-a-chip hardware solution is used to increase processing speed in [20]. In [21], knowledge about certain cites and situations (e.g. traffic light, pedestrian crossing etc) are used as priori information to optimize the vision processing algorithm. Sensor fusion approach is suggested in [22] where multiple sensors are used (e.g. radar and laser scanner) together with computer vision to reduce false positive rate.

Compared with camera operating on visible spectrum, infra-red (IR) camera [23] is not that sensitive to the change of lighting condition. The advantage of passive infra-red sensor is the ability to detect pedestrian without illuminating the environment. Pedestrians are bright and sufficiently contrasted with respect to the background in IR images and can be recognized by their shape and aspect ratio. To reduce the cost for infra-red camera which is used mostly in military application before, low cost 16 by 16 array infra red detectors are used in groups to not only count the pedestrian number passing by, but also capture pedestrians' moving trajectories along certain corridor in [24]. Honda has developed an intelligent night vision system which will be available on the new Honda Legend [25]. Two far infra-red cameras arc installed in the front bumper. The target distance is acquired by the stereo infra-red vision from two cameras. Pedestrians can be identified by the shape recognition and their movements are tracked through vector analysis. The system will provide the

driver visual and audio cautions when it defects pedestrians in or approaching the vehicle's path.

III. EXPERIMENTAL STUDIES OF PROMISING SENSING TECHNOLOGIES FOR TRANSIT BUS APPLICATION

Computer vision with image processing is a very promising technology and there have been commercial developments for other roadway or vehicle based sufety applications, such as sign or lane recognition. However, for pedestrian detection, there is limited availability of products that can be purchased for evaluation. Several different scnsors are selected for further experimental test and review. The sensors include IBEO laser scanner (scanning LIDAR), Eaton VORAD EVT-300 radar (Doppler radar), IRIS people counter (infrared based sensor), MS SEDCO SmartWalk 1800 (microwave radar) and SENIX Ultra-100 (ultrasonic sensor). Detailed testing and results on IBEO laser scanner and Eaton VORAD EVT-300 radar will be presented. The rest is summarized in table 1.

A. IBEO Laser Scanner

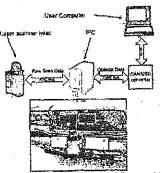


Fig. 1 Evaluation System Configuration and installation

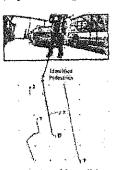
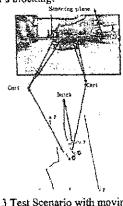


Fig. 2 Test Scenario with walking pedestrian

The tested system consists of a laser scanning head mounted on the front bumper of a Buick LeSabre, an industrial PC (IPC) and a user computer (Fig. 1). The raw sent data is sent to IPC via ARC net. Object detection and tracking algorithm is running on IPC. The results are a set of object data with each object's size, position and velocity. The object data is sent to the host computer via standard CAN bus. To facilitate user visualization, a CAN/USB converter is added so that user computer could receive object data through standard USB port.

A set of tests are conducted in the PATH vehicle tent under stationary conditions. Fig. 2 shows a pedestrian walking in front of the laser scanner. The laser scanner identifies the object as a pedestrian according to its size and velocity. Fig. 3 shows an interesting scenario. A cart is moving in front of the laser scanner. Since the scanning plane of laser scanner is cutting in the middle of the cart, the cart is actually recognized as two pedestrians by the laser scanner. Two poles close to each other are identified as a pedestrian due to its size and velocity. The Buick car behind the cart is also divided into two objects because of the cart's blocking.



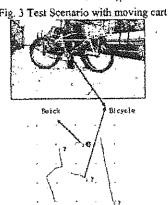


Fig. 4 Pedestrian with bicycle

Fig. 4 shows a pedestrian walking his bicycle in front of laser scanner. The bicycle blocks the pedestrian completely on the scanning plane. So the laser scanner only detects a bicycle sized object and could not detect the pedestrian behind. The bicycle also blocks part of the Buick. The remained part detected by the laser scanner is about the size of a pedestrian and it is recognized as a pedestrian.

The test results show that IBEO Laser scanner can provide object information with accurate distance (centimeter level) and azimuth angle (from 0.25 degree to 1 degree depending on scanning frequency). However since the laser scanner we tested can only provide object contours on one scanning plane, the information is quite limited for the pedestrian detection in the

complex urban scenario and false detection or missing target will happen if decision is solely based on such limited information (see Fig. 3 and Fig. 4).

B. Eaton VORAD EVT-300 radar

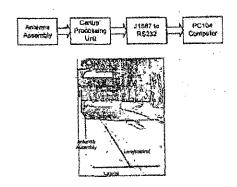


Fig. 5 Evaluation setup and configuration

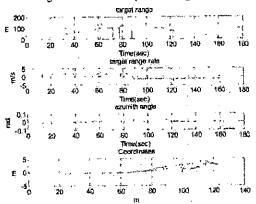


Fig. 6 Pedestrian walking in front of stationary bus longitudinally

Fig. 5 shows the system configuration of a testing system we installed on a New Flyer CNG 40 footer bus. The antenna assembly of Eaton VORAD VT-300 Doppler radar is installed behind the humper. Central processing unit processes information from antenna assembly. Target information like target ID, distance, azimuth angle and target velocity is sent out through J1587 bus by central processing unit. A J1587 to RS232 converter is installed so that onboard PC104 computer can read and log such information through serial port.

To evaluation the sensor performance, a set of evaluation tests are performed on PATH test track for both stationary bus scenario and moving bus scenario. First we parked the bus on the test track. A pedestrian walks in front of the bus from the longitudinal direction and the lateral direction as shown in Fig. 5. Fig. 6 shows the target information acquired when the pedestrian walks longitudinally back and forth along the yellow double solid line in the Fig. 5. The Eaton YORAD radar can detect the target up to about 130m with slow speed (<0.5m/s).

When pedestrian changes his walking direction, the detected speed drops to zero for a few seconds. At that time, Eaton VORAD radar cannot detect still (relative to bus) target, so we will see the target lost for a few seconds but reacquired after pedestrian picks up his speed to the other direction. The scenario also shows that the minimum distance for Eaton VORAD radar is about 5m.

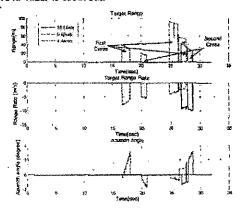


Fig. 7 Pedestrian walking in front of a moving bus laterally

Experiments are also conducted when the pedestrian crosses laterally in front of the bus at distances of 10, 15 and 20 meters. The Eaton VORAD radar can not detect the moving pedestrian in all three cases. This is due to the operating principle of Eaton VORAD radar. Eaton VORAD radar is a Doppler radar. The sensitivity of a Doppler radar is relative low to the target moving along the direction perpendicular to its radar wave propagating direction. Since the relative distance change between radar antenna and target is very small, it is difficult for the radar processor differentiate such small amount of frequency drifting from noises. Fig. 7 shows the target information acquired when the bus is moving about 10mph (4.44m/s), 15mph (6.67m/s) and 24mph (10.67m/s). A pedestrian crosses the test track from lateral direction twice in the same place at each speed. Both crosses are picked up by radar under different speeds. The target speed is about the same as the vehicle moving speed since pedestrian cross the track laterally. The azimuth angle changes its sign because pedestrian crosses the track back and forth.

The testing results show that:

- Eaton VORAD radar has a relatively long distance detection range over 120 meters. The shortest detection distance from experimental data is about 5 meters.
- Eaton VORAD radar can only detect target which is moving relative to the radar due to its Doppler principle
- Any target maintains relative still to the radar can not be detected. Unless a relative motion can create certain amount relative distance change, the target with relative motion can not be detected either. For example, the test data shows the sensitivity of radar drops significantly to the target with relative motion along the direction perpendicular to indar wave propagating direction

C. Functional Performance Comparison of Evaluated sensors: Similar tests are conducted for IRIS people counter, MS SEDCO SmartWalk and SENIX Ultra-100. Among those sensors that have been evaluated, a list of characteristics, attributes, and performance specifications are given below for comparative studies.

TABLE I

Product	Technology Carepary	Detection Range (m)	Accuracy	Targel Tracking range (m)/ Field of view	Anplication for Transh Hus
IBEO laser	Lidar	0 - 250	+- 1 cm	0 - 50/ 270 dagrees	Long range; bus nsoving
EVT-300 radar	Dopoler redat	5-140	5%/1-1	5 – 140/ 12 degraes	Long range; bus nusving
IRIS people	Infrared	2.5	On-off	N/A/ 60 degrees	Short range; bus stop
MS SEDCO SmartWalk 1800	Duppler radar	2-15	Car-nif	N/A/ 45-50 degrees	Short range; bus stop
SENIX Uhra-100	Uhrasonic	0.15 - 3	Car-off'	N/A	Shrut range; bus stop

IV. VEHICLE-INFRASTRUCTURE INTEGRATED SYSTEM APPROACH FOR TRANSIT BUS PEDESTRIAN DETECTION

Given the challenging operating environment of transit bases, it is apparent that a complete and reliable sensing system for pedestrian detection can benefit from the combined use of multiple sensors. For example, the requirements of pedestrian detection are different for situations when bases are stopped at bus tops or near intersections versus when the bases are moving at relatively higher speeds in cruising conditions. Furthermore, any one particular type of technology may have difficulties meeting all necessary requirements in various lighting conditions, or rainy and foggy and inclement weather conditions, not to mention that most sensor have limited field of view to monitor traffic in all directions. In addition, the clutter background and complex moving patterns of all objects on urban streets demand sophisticated processing of sensor inputs to avoid false detection and recognition.

In order to overcome the technical challenges of the aforementioned problem, a sensor-fusion and segmented approach is necessary. For example, ultrasonic sensor arrays and infrared detectors can be installed at selected locations around the bus to alert drivers of pedestrians near the bus. This can prevent inadvertent contacts or collisions with pedestrians when the bus is in transitions states from stopped positions. On the other hand, infrared carriera, laser scanner, and radar can be used for long-range detection in situations when drivers are unable or unaware of pedestrians at a distance.

One other promising approach has recently emerged with the advancement of wireless communication technologies. For example, the US Federal Communications Commission recently announced the details of the licensing and roadside unit registration process for Dedicated Short Range Communications (DSRC) in the 5.9 GHz band. DSRC can be applied for many applications, a primery one of which is

roadway safety. In a potential transit solution, a vehicle-infrastructure solution can be constructed. For example, an evaluated inicrowave pedestrian detector (such as MS SEDCO SmartWalk) is ideal for monitoring pedestrian movements on crosswalks. In traffic conditions where drivers have obstructed views or limited visibility to pedestrian crossing areas, an infrastructure sensor can be used to detect objects and a wireless signal can be sent remotely to a receiver on the bus with a visual or audio alert given to the driver. This suggested approach is particular sensible because transit buses run on fixed routes and safety solutions can be selectively deployed at high-risk locations along the bus routes.

V. Conclusion

The work presented in this paper represents recent offorts taken by the research team to address pedestrian safety. With a survey of latest technology developments and available products, a number of sensors were selected for evaluation to assess their applicability for transit bus platforms. Through experimental exploration, the characteristics and limitations of individual sensors were investigated and compared.

For large-scale deployment, certainly cost considerations will play a big role in the selection of technologies or components. Either to be used for a specific function, or to be integrated within a complete solution, products need to be cost competitive for a broad-based utilization. Even though certain promising and sophisticated technologies may be cost prohibitive currently, they may become more affordable in the future as they find marketable applications and unit costs are reduced in mass production.

With the consideration of distinct operating environment of transit buses, the detection problem is handled with a two-prong approach: one aiming for short-range when buses are pear bus-stop or intersections, and the other targeting longer-range detection when buses are cruising at higher speeds. A viable option to provide an integrated solution will be to combine infrastructure sensors, at strategic locations such as crosswalks or high risk areas, and wireless communication links to send detection signals to an on-board unit to alert drivers of potential threats.

ACKNOWLEDGMENT

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The authors wish to thank our colleagues, David Marco, Thang Lian, David Nelson, Susan Dickey, Paul Kretz, and Bart

Duncil, for their generous supports and contributions in the

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EXHIBIT 24

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Eaton VORAD enhances collision warning system

Posted: Sep 2, 2005 9:22 AM | Last Updated: Aug 1, 2014 10:48 AM

Eaton VORAD

Eaton VORAD Technologies, a subsidiary of Eaton Corp., is partnering with Preco Electronics of Boise, Idaho, to offer a stand-alone sideobject-detection system. This side sensor will be added to Eaton's current VORAD safety product line. It's a compact, cost-effective, radar-based object-detection system for trucks, buses, and RVs. The Eaton VORAD EVT-300 Collision Warning System uses in-cab display units with a series of warning lights and audible tones to warn the driver of the presence of objects and vehicles in its way, giving the driver time to take action to avoid a collision. Call 1-800-826-4357 or visit www.roadranger.com.

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EXHIBIT 25

International Motor Coach Group has awarded the title of Alliance Partner of the Year to Brenda Borwege, vice president of marketing for AEC Companies.

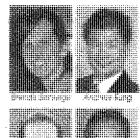
The award recognizes an IMG alliance partner that "participates in industry leadership roles, promotes IMG within the industry, actively perticipates in IMG programs, and demonstrates vision and commitment to building relationships with BMG shareholders.

"Brenda exemplifies a true partner who is always willing to offer assistance and participates in all efforts to build our industry," said BAG Chairman Jack Wieley.

ABC Companies has appointed Andrew Fung its director of engineering services. Working in the company CustomerCare Division, and reporting to division vice president Chuck Avery, Fung will be responsible for the direction of the technical staff, including engineers, field technicisms and the CustomerCare call center. He will provide customers with technical support for their ABC products while serving as the liamon betwosu customers and the product manufacturers. He also will be responsible for new product development, including bases, parts and services. A graduate of the University of Manitobs with a degree in engineering, Fung has speet the past 12 years working in the motorcoach industry, most recently as director of ficet support engineering for Motor Coach Industries. He has relocated to the Orlando area from Louisville, Ky.

Prevost Car has appointed Mark Armstrong as branch managor of its pasts and service center in Mira Loma, Calif. Amstrong will be responsible for overseeing dayto-day operations of the facility.

Armstrong is a former sales



director for a high-end electronics manufacturer and holds an MBA in technology management and a bachelor's degree in electrical engi-

"Mark's background in engineering, process standardization and ISO standards will be an esset to us as we move forward with our branch standardization program," said Prevost Service Network Manager Randy Castillo.

Gene Perro has joined the P.A. Post Agency of Mahwan, N.I., a leading motorcoach industry insuronce agency and brokerage, as a sales executive.

Perro comes to P.A. Post Agescy with more than 20 years of insurance experience, most recently as an executive with KMA Insurance Agency in Burnsville, Min. He has been focused on the passenger improportation industry for the past 15 years.

"Gene Perro's extensive experience and abilities in providing insurance programs for the transportation industry is a great asset to P.A. Post Agency, said Brad Post, president of the family owned

.E-mail Perro at gyerro@pastfinancial.com.

Coach America to retrofit lifts

RIVERSIDE, Calif. - Complete Coach Works has received a contract for the installation of wheelchair lifts in MCI coaches operated by Coach America's operation in Long Beach, Calif.

The contract includes providing Ricon wheelchair lifts and custom installation, including integration of the lifts into the bus system.

Three lifts are expected to be installed this year, with three more next weir.

John Romero, maintenance manager of Coach America in Long Beach, said Complete Coach Works was chosen for the work because of its "vast experience with these types of modifications. Their emphasis on quality and customer satisfaction have served us well in the past, and we are bappy to have Complete Coach Works as a key service provider and supplier."

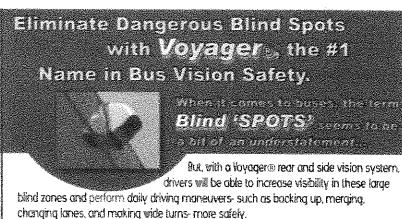
our parts and service center of

DaimlerChrysler Fla. center gains seal

GREENSBORO, N.C. -DaimierChrysler Commercial Buses North America says its Florida service and parts center has been awarded the Blue Seal of Excellence by the National Institute for Automotive Service.

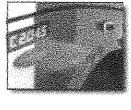
of certification by the institute.

Florida has been recognized.... The award is the highest level said Patrick Scully, chief commercial officer for DaimlerChrysler "We are extremely proud that Commercial Ruses North America



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FirstGroup eyes October to complete Laidlaw deal

ABERDEEN, Scotland - The takeover of Laidlew International and its subsidiary, Greyhound Lines, by First Group PLC is expected to be completed early next mond.

Scotland-based FirstGroup annovaced it was close to clearing the final obstacle - U.S. antitrust approval -- in the way of completing its acquisition of Laidlaw, which owns Greybound.

FirstGroup's announcement was followed by a statement from Laidlaw saying that "substantial progress" had been made in discussions with the actitudal division of the U.S. Justice Department about the major share of the American

school bus market the takenver would give FirstGroup.

Rachael Borthwick, First-Group's corporate communications director, said the company had reached agreement in principle with the Justice Department officials and with a group of state attorneys general which had expressed an interest in the deal.

The interest by the state attoracys stems from the extensive school bus services operated by both Laidlaw and First Group.

la its amouncement, First-Group said it expected to conclude an agreement with the autitrust division which would allow it to complete the deal by Oct. 7.

EXHIBIT 26

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DISTRICT COURT
                    COUNTY OF CLARK, NEVADA
                                CASE NO. A-17-755977-C
                                 DEPT NO. XIV
KEON KHIABANI and ARIA
KHIABANI, minors by and
through their natural mother,
KATAYOUN BARIN; KATAYOUN
BARIN, individually; KATAYOUN
BARIN, as Executrix of the
Estate of Kayvan Khiabani,
M.D. (Decedent) and the Estate )
of Kayvan Khiabani, M.D.
(Decedent),
           Plaintiffs,
vs.
MOTOR COACH INDUSTRIES, INC.,
a Delaware corporation;
MICHELANGELO LEASING INC.,
d/b/a RYAN'S EXPRESS, an
Arizona corporation; EDWARD
HUBBARD, a Nevada resident;
BELL SPORTS, INC. d/b/a GIRO
SPORT DESIGN, a California
corporation; SEVENPLUS
BICYCLES, INC. d/b/a Pro
Cyclery, a Nevada corporation; )
DOES 1 through 20; and ROE
CORPORATIONS, 1 through 20,
              Defendants.
                DEPOSITION OF BRAD ELLIS
```

Monday, August 28, 2017 Winnipeg, Manitoba, Canada Job Number 413397

BRAD ELLIS - 08/28/2017

1	Page 13 Q And is that your signature on it?
2	A Yes.
3	Q Can you read for the record what the
4	letter says?
5	A Sure. It says:
6	"Ken: By the way of this letter, New
7	Flyer Engineering maintains the position
8	that the installation of the S-1 Gard in
9	New Flyer facilities does not compromise
10	the integrity of the chassis or suspension
11	of the coach on which it is installed, nor
12	is it expected to impact the functionality
13	or integrity of other systems in the
14	coach."
15	Signed by myself.
16	Q And at the time that you signed it, what
17	does it indicate your job position was?
18	A I was working under engineering at that
19	point. There was if I recall, there was a time
20	where I got moved out of manufacturing when I got my
21	engineering paper work, my professional engineering
22	stamp. And there was a time in between when I ran
23	I got to structural engineering manager eventually,
24	but there was a transition time where I still worked
25	with the manufacturing engineering personnel along
1	