

# CAAS GVS Public Comment Clarification

## Original Public Comment #1:

### **C.12.6 LITTER FASTENER AND ANCHORAGES - NOTE TO PURCHASERS**

**(Also found in F.6.3 for Remounts)**

*Delete paragraph #1 in its entirety and replace with the following:*

*It is a requirement of the SAE J3027 standard that all three litter system components specified by the purchaser have been type tested, together as a complete system: wheeled litter in litter fastener with patient restraints attached.*

*Certification evidence of the SAE J3027 tests shall be included in the owner's manual per section C.19.*

## New Proposal for Public Comment #2:

C.12.6 DELETE NOTE TO PURCHASERS AND ADD THE FOLLOWING C.12.6.1 AS ADDITIONAL REQUIREMENTS:

### **C.12.6.1 LITTER FASTENER AND ANCHORAGES – ADDITIONAL REQUIREMENTS**

**(Also found in F.6.3 for Remounts)**

*It is a requirement of the SAE J3027 standard that all three litter system components specified by the purchaser have been type tested, together as a complete system: wheeled litter in litter fastener with patient restraints attached.*

*Certification evidence of the SAE J3027 tests shall be included in the owner's manual per section C.19.*

*To ensure occupant and equipment safety during transport, the litter retention system shall comply with SAE J3027, either through dynamic testing of the complete vehicle system or by demonstrating substructure compliance in accordance with SAE J3102. If the complete ambulance is not dynamically tested per SAE J3027, the underlying subfloor structure must independently meet the requirements of SAE J3102. This validation ensures that the mounting surfaces to which the litter device is secured can withstand the load requirements prescribed in SAE J3027.*

*Structural reinforcement of the floor system is required in all cases to support the litter retention system loads, whether integrated during initial vehicle build or retrofitted by an upfitter.*

*In addition, the required installed cot rail (floor plate) shall be installed in accordance with the litter fastener's manufacturer's recommendations per C.12.6 Para 1.*

**SPECIAL NOTE FOR TYPE II VEHICLES:** *Compliance with SAE J3102 cannot be achieved using the OEM chassis subfloor alone, without additional structural reinforcement.*

*FSAMs manufacturing Type II vehicles must provide certification documentation demonstrating subfloor compliance with SAE J3102, as required in Section D – CAAS GVS COMPLIANCE CERTIFICATION REQUIREMENTS.*