

Transmitted by the expert from OICA

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agenda item 4.5.)

OICA's comments on ECE/TRANS/WP.29/GRE/2006/18

OICA generally welcomes document ECE/TRANS/WP.29/GRE/2006/18 transmitted by GTB.

However, OICA would like to comment this document, in addition to the proposal for improvements already provided in document ECE/TRANS/WP.29/GRE/2007/32.

In document ECE/TRANS/WP.29/GRE/2006/18, para. 6.3.6.1.1. prescribes a defined vertical inclination of the cut-off of -1.5 per cent.

This requirement is new as the current text of the Regulation does not ask for it. OICA does not see any technical reason for such a requirement and draws the attention of GRE on the technical difficulty to meet the performance. The front fog lamp cut-off is more indistinct than e.g. the dipped beam cut-off, and such aiming requirement adds non-negligible burdens to the manufacturer.

In addition, this requirement could conflict with some national domestic regulations.
