

OICA's concerns about daytime running lamps

Even as a voluntary commitment, the vehicle manufacturers are currently unable to design a vehicle, which may have a chance to comply with the DRLs future requirements.

As a general statement, in view of the amount of the pending technical items to be resolved, OICA wonders the opportunity for a GRE informal group addressing technical matters with the target to table conclusions to GRE 58th session. OICA is hence keen to table the following list of questions at GRE 57th session in order to get clarification on the urgent technical issues related to daytime running lamps:

- 1) Automatic switching of the dipped beam headlamps (ECE/TRANS/WP.29/2007/20):
 - a) Necessity to separate this question from DRL (see separate document GRE-57-20);
 - b) alternative solution for the complete signalling of the vehicle – e.g. illumination of the rear position lamps at least with DRLs.
- 2) Could dipped beam, front fog lamps, direction indicators, etc. be allowed instead of d/DRLs (definition of a "DRL function", colour)?
- 3) Conflict with national use regulations:
 - a) position of the non-EU Member States and their requirements (Turkey, etc.);
 - b) Does the GRE proposal (ECE/TRANS/WP.29/2006/88) meet the concerns of Scandinavian countries (are they happy not to profit the DRL solution - rear position lamps)?
 - c) What solution as DRL (variable, output level, etc.) could be acceptable to Japan?
 - d) Presence of a lamp: ECE/TRANS/WP.29/GRE/2007/4 (Italy).
- 4) Hierarchy of the Regulation structure (relationship between devices should not be in para. 6 but rather in para. 5 of Regulation No. 48):
 - a) Electrical connections with front fog lamps regarding the use of the position lamps (ECE/TRANS/WP.29/GRE/2007/5 - NL, D, Italy);
 - b) Criteria for switching – design of the current switches and sequences and wiring should not be modified.
- 5) GTB proposal on distances (ECE/TRANS/WP.29/GRE/2007/21): difficulty in mixing the current requirements (400 mm distance to outboard of vehicle) with the new proposed distances.
- 6) Issues specific to HCVs (transitional provisions, position lamps switching, etc.).
- 7) Necessity of the front position lamps if DRLs are made mandatory (the front of the vehicle is anyway permanently illuminated).
- 8) Safety cost ratio for DRLs.
- 9) Transitional provisions.
- 10) Amendments to Regulation No. 87:
 - a) ECE/TRANS/WP.29/GRE/2007/10: extends the scope of Regulation No. 87 to vehicles of category L. FEMA issues (towards Japan).
 - b) ECE/TRANS/WP.29/GRE/2007/11: clarifies that the light sources connected in series are considered to be one light source for light intensity measurement purposes.
 - c) To be considered in relation with draft 04 series of amendments to Regulation No. 48 (DRLs).
- 11) Harmonization FMVSS 108 / UNECE Regulation No. 48 (divergence of requirements).
- 12) Class A headlamps out of subject of DRLs (ECE/TRANS/WP.29/2006/88).