

UK COMMENTS ON ECE/TRANS/WP.29/2007/20/Rev.1

Note: The text reproduced below was prepared by the expert from the United Kingdom to highlight our concerns with document ECE/TRANS/WP.29/2007/20/Rev.1 and to propose amendments to the document for further discussion.

A. PROPOSAL

Paragraph 6.2.7., amend to read

"6.2.7. Electrical connections

The control for changing over to the dipped-beam ...

...

... or by other means accepted by the authority responsible for type approval.

~~Dipped-beam headlamps may be switched ON or Off automatically. However, it shall be always possible to switch these dipped-beam headlamps ON and OFF manually~~"

New paragraph 6.2.7.1., amend to read:

"6.2.7.1 Dipped-beam headlamps shall be switched ON or OFF automatically. They shall be switched ON when it is required to drive with the dipped-beam headlamps switched on due to low ambient lighting conditions (e.g. during nighttime driving conditions, reduced visibility, tunnels, etc..). **On the request of the manufacturer the sensitivity of the device to control the automatic switching of the dipped-beam headlamps may be adjustable.**

However it shall be always possible to manually override the automatic switching of the dipped-beam headlamps.

The automatic switching between the Daytime Running Lamps and the dipped-beam headlamps shall be re-activated when both of the following conditions are satisfied:

The engine has been inoperative for a continuous period of more than [30] minutes and;

The engine is [manually] re-started."

Paragraph 12.13., to be deleted (and renumber following paragraphs)

Paragraph 12.14., amend to read:

"12.1413. As from 42 months for vehicles of categories M1 and N1 and 60 months for vehicles of other categories after the official date of entry into force of the 04 series of amendments, Contracting Parties applying this Regulation shall grant ECE approvals only if the vehicle type to be approved meets the requirements of this Regulation as amended by the 04 series of amendments. ~~including the requirements of paragraph 6.2.7.1.~~"

B. JUSTIFICATION

Paragraph 6.2.7.

It is necessary to clarify the intended amendment to this paragraph. Our understanding is that the intention is to delete the last paragraph which is clearly shown in our proposed text.

Paragraph 6.2.7.1

This revised text clarifies that the automatic switching between the DRLs and dipped beam headlamps does not need to be reactivated when the vehicle is stationary with the engine stopped for short periods.

A growing number of vehicles have the ability to automatically stop and start the engine, for example at traffic lights, to reduce emissions. In such cases the driver who has overridden the automatic switching, possibly to turn on the headlights, will need to reactivate the lights (and rear fog lights if these are in use at the time) after each engine re-start. This has the potential to be frustrating and possibly dangerous in urban environments where stop start driving is common. Our proposed text ensures that the automatic switching of the dipped-beam headlamps does not need to be reactivated if the engine starts and stops automatically.

Additionally, drivers engaged on delivery journeys, which may involve many brief stops, will need to reactivate the manual switching of lights after each stop, however brief. We therefore propose that the engine may remain stopped for up to [30] minutes before the automatic switching of the dipped-beam headlamps is required to be reactivated.

We do not accept the proposal in WP.29/2007/20/Rev.1 that an adjustable sensor should be permitted as an alternative to a manual override switch. There are many situations where the driver may need to turn the lights on or off which may conflict with the automatic switching even where adjustable sensitivity is fitted. For example if the sensor cannot detect fog then the driver must be able to override the automatic switching to switch their lights on.

The revised text ensures that the driver always has manual control of the switching of the headlamps.

Paragraphs 12.13 and 12.14 (transitional provisions)

The wording of Paragraphs 12.12, 12.13 and 12.14 in WP.29/2007/20/Rev.1 creates a number of inconsistencies. For example M1 vehicles approved to the 04 series of amendments for the first 30 months after entry into force must be fitted with automatic switching of dipped-beam headlamps. Between 30 and 42 months the fitting of automatic switching is actually prohibited. After 42 months the fitment of automatic switching becomes mandatory again.

This situation is summarised in the following table:

	Approval to 03 series of amendments		Approval to 04 series of amendments	
	DRL	Automatic switching of dipped beams	DRL	Automatic switching of dipped beams
Entry into force of 04 series of amendments (para 12.12)	Optional	Optional	Mandatory	Mandatory
30 months after entry into force of 04 series of amendments (para 12.13)	Approval to 03 series no longer permitted		Mandatory	Prohibited (optional fitment of automatic switching not permitted)
42 months after entry into force of 04 series of amendments (para 12.14)			Mandatory	Mandatory

This can be explained in more detail as follows:

Entry into force of 04 series of amendments (paragraph 12.12)

Approval may be granted to the 04 series of amendments, vehicles must have DRL fitted. New paragraph 6.2.7.1 applies therefore automatic switching of the dipped-beam headlamps must be fitted.

Alternatively approval to the 03 series of amendments may be obtained, the fitment of DRL is optional and automatic switching of the dipped-beam headlamps may be fitted at the option of the manufacturer.

30 months after entry into force (paragraph 12.13)

Approval to 04 series of amendments is required with the exception of paragraph 6.2.7.1. DRL must be fitted. Paragraph 6.2.7.1 is not applied therefore automatic switching of the dipped-beam headlamps is not required. However the last sentence of paragraph 6.2.7. which previously allowed the option of automatic switching has now been deleted therefore the fitting of automatic switching is actually prohibited.

42 months after entry into force (paragraph 12.14)

Approval to 04 series of amendments is required. DRL must be fitted. Paragraph 6.2.7.1. applies and automatic switching of the dipped-beam headlamps must be fitted.

Our proposed text simplifies the transitional provisions, introducing a single date for the introduction of mandatory DRL and mandatory automatic switching of the dipped-beam headlamps. This avoids the situation described above.

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