

### **Comments to OICA proposal in document ECE/TRANS/WP.29/GRE/2010/16**

Note: The text reproduced below was prepared by the experts from the Netherlands and the United Kingdom in response to the proposal from OICA (ECE/TRANS/WP.29/GRE/2010/16), which aims to introduce provisions into Regulation No. 48 to allow the exterior courtesy lamps to operate when the vehicle is in motion (slow manoeuvres).

The preferred option of the experts from the Netherlands and the United Kingdom is to keep the status quo, i.e. not to change anything in Regulation No. 48 in this respect. We believe it should not be acceptable to allow the exterior courtesy lamps to operate when the vehicle is in motion, even if this is restricted to slow manoeuvres.

While we recognize the need to further improve the safety of vulnerable road users, such as pedestrians, we do not consider that supplementary illumination for slow manoeuvres will provide additional benefits and so it is not considered to be an urgent necessity, particularly with regard to passenger cars and small commercial vehicles. The expert from OICA, however, claims that many accidents happen in particular low speed and reversing situations. Unfortunately, this claim is not substantiated by any numbers or other statistical evidence.

Moreover, supplementary illumination for slow manoeuvres and reversing situations is already allowed in the current Regulation, by means of other lamps (reversing lamps, cornering lamps). The expert from the Netherlands already drew attention to this fact during the 62<sup>nd</sup> session of GRE.

We also wonder how this all will be controlled in the aftermarket. If the illumination of such lamps is allowed by Regulation No. 48, even whilst the vehicle is in motion and the doors are closed, then the National laws (e.g. circulation requirements) of Contracting Parties that are signatories to Regulation No. 48 can not forbid (retro-) fitment and use of such illumination.

Allowing illumination of exterior courtesy lamps when a vehicle is at standstill with all doors closed, and even when in (low speed) motion, would mean that all kind of lamps (e.g. neon light bars) could be mounted underneath the car and possibly be switched on many times in, for instance, city traffic conditions. Such a feature could certainly be very “interesting” for certain drivers (youngsters), who may want to draw extra attention to their cars.

Yet another complication would be the periodical technical inspections. How would these lighting systems be assessed during such inspections? What are the criteria for the lamps used, for instance?

In conclusion, we do not support the current proposal from OICA to allow the illumination of exterior courtesy lamps whilst the vehicle is in motion, particularly because exterior courtesy lamps are not subject to comprehensive regulation (since they were only meant to be operated on stationary vehicles).

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