



Informal Document No. **GRE-63-27**
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agenda item 6)

Horizontal Reference [Regulation]

63rd GRE

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Challenge of collective amendments

(e.g. - 10 docs prohibiting use of light source module in cap-holder system for approved light sources, or 23 docs in item 5.c)

- Confusion & misinterpretation of provisions having the same intent
 - Different texts in individual device Regulations to express same idea caused by
 - time of Regulations' development
 - numerous and chaotic amendments
- Introduction of a new concept fitting one device followed later by several amendments to “align” devices with previously agreed solution (e.g. “Y” lamps)

Solution – step one

- Create “*Horizontal Reference [Regulation]*”
 - Identify and consolidate all common provisions
 - Administrative
 - All Items related to type approval
 - Marking
 - [Transitional Provisions for collective amendments]
 - Technical
 - Definitions
 - Specifications
 - Test procedures

Solution – step two

- Amend individual device Regulations
 - Leave all paragraphs
 - Administrative / type approval
 - Refer to Horizontal Reference [Regulation]
 - Technical
 - Refer to Horizontal Reference [Regulation]
 - Maintain device unique provision
 - Do not change series of amendments
 - Change ‘Revision’ number

Horizontal Reference [Rgulation]

1. Scope
2. General definitions
3. Application for approval
4. Markings
5. Approval
6. General requirements
7. Intensity of light emitted
8. General test procedures
9. Colour definitions
10. Modifications ...& ext. of approval
11. Conformity of production
12. Penalties for non-conf. of prod.
13. Production definitely discontin.
14. Tech. serv. & admin. depts
15. [Transitional Provisions]

Device Reg.

1. Scope
2. Ref. HR + unique definitions
3. Reference to HR
4. Ref. HR + unique markings
5. Reference to HR
6. Ref. HR + unique requirements
7. Ref. HR + unique photometry
8. Ref. HR + unique test procedures
9. Colour of emitted light + Ref HR
10. Reference to HR
11. Reference to HR
12. Reference to HR
13. Reference to HR
14. Reference to HR
15. Ref. HR + unique Trans. Prov

Minor collective amendment

- Horizontal Reference [Regulation]
 - Amend provisions (one precise change)
 - If necessary
 - Amend format / content requirements of general communication document
 - [Amend Transitional Provisions]
- Individual device Regulation
 - No amendment required

Major collective amendment

- Horizontal Reference [Regulation]
 - Amend technical provision (one precise change)
 - Amend general marking specification
 - Amend general communication document
 - format / content requirements / etc
 - [Amend Transitional Provisions (if needed)]
 - [Change series of amendments]

Major collective amendment

- Individual device Regulation
 - Change series of amendments
 - Amend unique device marking provisions
 - Amend specific Transitional Provisions
(if needed)
 - [Amend references to reflect new series of amendments of the Horizontal Regulation
(one 'replace' action)]

Legal consequences

- NO Type Approval to Horizontal Reference [Regulation]
- Individual device Regulation = status quo
 - Series of amendments
 - [reflect change in series of amendments in references to Horizontal Regulation]
 - Transitional Provisions
 - [in addition to Horizontal Regulation]

Benefits – CP & secretariat

- No patchwork of multiple amendments
 - Provisions change for all devices
 - Same way & Same time
 - Minimized chance for errors
- No surprises
 - Chance to evaluate new idea as it affects all involved devices
- Chance to improve and harmonize test procedures
- Chance to update obsolete provisions
- Reduced paperwork and administrative effort

Benefits – Test house

- Clear identification of core requirements
 - Administrative
 - type approval process
 - marking
 - Technical
 - test procedures
 - performance requirements
 - Opportunity for well defined (streamlined) in-house test procedure setup & chance to eliminate unnecessary tests
- Clear presentation of unique provisions
 - Opportunity to evaluate their need

Summary – Horizontal Ref. [Reg.]

- Establish Horizontal Reference [Regulation]
 - Consolidate common provisions
 - Harmonize individual Regulations
 - Improve administrative procedure
 - Update test procedures
 - Eliminate outdated performance requirements
- [Make Horizontal Regulation a “legal” tool in jurisdiction of CPs applying individual Reg.
 - Attach HR as annex to the 58 Agreement or
 - Agree that all CPs apply the HR]

Summary – Individual Regulation

- Amend individual device Regulations
 - Update vis-à-vis new technology & new needs
 - Identify device-specific performance needs
 - Revise and reduce device-specific performance requirements
 - Revise need for individual test demands
 - Revise and update Transitional Provisions

Thank you!