

OICA comments on ECE/TRANS/WP.29/GRE/2018/34.

1. Since the descriptions about validity of existing type approvals are deleted by ECE/TRANS/WP.29/GRE/2018/34, the validity became unclear. OICA have a question whether;
 - (a) Contracting Parties applying this Regulation shall continue to accept existing type approvals to this Regulation;or
 - (b) Contracting Parties applying this Regulation shall not be obliged to accept existing type approvals to this Regulation.
2. Different interpretations might be given by each type approval authority. As car manufacturers, OICA is afraid of parts supply stop due to interpretation troubles between type approval authorities and lamp manufacturers.
3. Same problems might happen to spare parts. Granting type approvals to spare parts is guaranteed by paragraph X.4.3. However, accepting type approvals to spare parts is also unclear.
4. There is no technical change between the current Regulations (R3, R4, R6...) and the new Regulations (LSD, RID, RRD). OICA thinks that renewals of all existing type approvals are waste of time.
5. OICA does not want to stop the SLR package by this issue. However, OICA would appreciate it if GRE could give advice about these transitional provisions for clear interpretation.