

## **Proposal to amend the document ECE/TRANS/WP.29/GRE/2019/20 submitted by the expert from the Special Interest Group related to a new 08 series of amendments to Regulation No. 48**

**Note:** The text reproduced below, which is based on the Special Interest Group's proposal for a new 08 series of amendments to UN Regulation No. 48, is prepared with a view to clarify the conditions under which the vehicles may circulate with the dipped beam headlamps switched OFF.

The text with red characters below indicates the changes proposed by Japan and EC.

### **I. Proposal**

*In addition, the following subparagraphs 6.2.7.5.1. apply.*

6.2.7.5.1. Irrespective of the requirements of paragraph 6.2.7.5., under conditions requiring the dipped beam headlamps to be switched ON, the dipped-beam headlamps may remain switched OFF or, once automatically switched ON, may be switched OFF manually and remain switched OFF while one or more of the following conditions exist:

- (a) the automatic transmission control is in the park position;
- (b) the parking brake is in the locked position;
- (c) prior to the vehicle being set in motion for the first time after each manual activation of the device, which starts and/or stops the propulsion system;
- (d) (i) the control is designed in such a way that manual deactivation shall not be possible with less than two deliberate actions. The lamps referred to in paragraph 5.11. shall be switched ON,

or

- (ii) if the vehicle speed does not exceed ~~25 km/h~~ **15 km/h**, the control shall be designed in such a way that manual deactivation shall not be possible with less than two deliberate actions. The lamps referred to in paragraph 5.11. may remain switched OFF provided that, throughout the entire period that these lamps are switched OFF, it is indicated to the driver with an optical and with an acoustic or haptic warning signal.

- (e) the front fog lamps are switched ON;

[(f)...].

The automatic operation of the dipped-beam headlamps shall be resumed as soon as the conditions in this paragraph no longer exist."

## **II. Justification**

1. Among the conditions specified in paragraph 6.2.7.5.1.(d)(ii), under which all lamps may remain switched OFF, the proposal (document ECE/TRANS/WP.29/ GRE/2019/20) has changed the most important condition, i.e., speed limit, from 15 km/h to 25 km/h, without a clear and reasonable justification. We therefore cannot accept it as a justifiable change.
2. Allowing vehicles with no lighting to be driven at 25 km/h creates a major safety concern.
3. The proposed provision does not specify any maximum distance over which vehicles with no lighting may be driven. We are concerned that, under this provision, vehicles with no lighting could be driven over long distances.
4. Paragraph 2.47. of UN Regulation No. 16 provides that a vehicle is in normal operation when the vehicle is in forward motion at a speed greater than 10 km/h. In view of this definition and for the reasons of safety of other road users, we should not allow vehicles with no lighting to be driven at a speed greater than 10 km/h. However, we propose the speed limit of 15 km/h in accordance with the explanations provided in GRE-80-10, taking into account the “tolerances allowed by UN Regulation No. 39 for the speedometers”.