



August 2001

**PROPOSAL FOR A CANDIDATE DRAFT GLOBAL TECHNICAL REGULATION –  
INSTALLATION OF LIGHTS**

**TRANS/WP.29/GRE/2001/6 dated 11 June 2001**

**OICA COMMENTS**

Paragraph 2.16.1 (single lamps)

OICA understands that GRE is actively seeking a new definition. On the other hand, some new developments are ongoing, in particular relating to Advanced Front Lighting Systems, which might need quick amendment to the definition of single lamp.

At this point of time, OICA however is not in a position to present a proposal, but might have a suggestion at the occasion of the September 2001 GRE session.

Paragraph 2.20.3 (discretionary lamp)

OICA would like to enter a study reservation on this concept that might well contradict the basic idea of global harmonization, which is, in OICA's understanding, to allow products to be developed and marketed globally.

Paragraph 2.20.4 (additional lamp)

OICA would like to enter a study reservation on this proposed definition, which is believed to be unnecessary in a Global Technical Regulation.

The 1998 Agreement indeed already provides for sufficient flexibility for individual countries and/or regions.

Paragraph 5.21 (movable components)

Here again, OICA would like to enter a study reservation which might however be lifted in the near future.

Paragraph 6.5.3 (arrangement for direction indicators)

OICA has some doubts relating to the 2<sup>nd</sup> part of this paragraph ("The choice of ... if it exists"). OICA believes such specification, as currently worded, would be unworkable in a GTR.

Paragraph 6.5.4.2 (height of direction indicators)

OICA fully opposes the 600 mm distance requirement for the optional direction indicators in the last part of this paragraph. OICA moreover has a study reservation on the words "and at a vertical distance as large as the shape of the bodywork makes it possible above the mandatory direction indicator lamps."

OICA indeed still considers that some flexibility should be granted for these additional, optional direction indicators.

Paragraph 6.5.5.1 (geometric visibility - direction indicators)

OICA confirms its position that, for the rear direction indicators of motor vehicles, an outward angle of 45° is sufficient, since it is already supplemented by the side direction indicator. Allowing 45° only in combination with a flashing rear side marker lamp is a redundancy and a contradiction of harmonization since red side marker lamps would not be allowed to flash. Consequently, the relevant text should read:

*"Motor vehicles: 45° inwards and 45° outwards"* (delete the rest).

Paragraph 6.7.2 (number of stop lamps)

The references S1, S2, S3 should be deleted.

Paragraph 6.7.7 (electrical connections of stop lamps)

The first sub-paragraph relating to *"the device which starts or stops the engine"* may need review, depending on the outcome of paragraph 2.24.1.

Paragraph 6.10.4.2 (position of rear position lamps)

The present option of maximum 2100 mm in case of structural problems should be kept. It might be necessary in some cases.

Paragraph 6.10.5.1 (geometric visibility of rear position lamps)

See paragraph 6.10.4.2: if the option of 2100 mm is deleted, then the last part of paragraph 6.10.5.1 will need review.

Paragraph 6.12.7 (electrical connections of parking lamps)

See comments on paragraph 6.7.7.

Paragraph 6.21.4.2 (position of cornering lamps)

Replace by: *"In length: not more than 1 m from the front."*

Paragraph 6.21.4.3 (height of cornering lamps)

OICA suggests replacing the figure for the maximum height of 800 mm by 900 mm.

Paragraph 6.21.5 (geometric visibility of cornering lamp)

Replace by: *"Geometric visibility  
horizontal angles: 30° to 60° outwards  
vertical angles: 10° upwards and downwards"*

Paragraph 6.21.9.3 (inclination of cornering lamp)

OICA suggests to delete this paragraph altogether since it does not appear to serve any useful purpose in a GTR.