

SUBJECT: REGULATION NO. 46, REAR VIEW MIRRORS

Ref. Document No.: TRANS/WP.29/GRSG/2004/10,

INDIA'S COMMENTS

(Ref. Cl. No. 15.1.4)

The clause no. 15.1.4 needs clarification for the statement “**When established through windows they shall** have a total light transmission factor of at least 70 percent measured normal to the surface’.

NEED FOR CLARIFICATION:

We interpret this statement considering “ Driver is observing the object in rear view mirror through side window glass, he should receive minimum 70% of incident light from the object”.

With this as a probable interpretation and taking into consideration allowable light transmittance of window glass to be 70% minimum (ECE R 43) , allowable light reflectance of rear view mirror of be 40 % (ECE R 46), driver in these minimum acceptable conditions will receive only 28 % of incident light from the object he is observing in the rear view mirror.

Thus there is an anomaly considering requirement of 70% light transmittance factor as specified in clause No. 15.1.4
