

Transmitted by the expert from Japan

INTERPRETATION OF PARAGRAPH 6.12.9. OF REGULATION No. 48
(Parking lamp functions performed by front and rear position lamps)

A. BACKGROUND

Paragraph 6.12.9. of Regulation No. 48 stipulates that "the functioning of this lamp may also be performed by simultaneously switching on the front and rear position lamps on the same side of the vehicle". During the discussion with some experts at the last GRE session, Japan learned that many European approval authorities have the opinion that those lamps are front and rear position lamps and that, concerning photometric characteristics, they have to meet the requirements of position lamps (Regulation No. 7), not of parking lamps (Regulation No. 77). However, Japan has following different opinion for this interpretation:

-Paragraph 6.12.9. says that the functioning of this lamp (i.e. parking lamp) may also be performed (i.e. carried out) by the position lamps. As this paragraph doesn't stipulate that the position lamp is deemed to be met with the requirement of the parking lamp in this case, this means that the conformity of these lamps are judged by the requirements of parking lamps, not of position lamps, and thus have to meet the requirement of parking lamps (Regulation No. 77).

-If those lamps are position lamps, they have to comply with the requirements of the number and electrical connection of position lamps, but they don't. And vehicle manufacturers explain to vehicle users (on switches or owner's manuals) that those lamps are parking lamps. So it seems that there is a discrepancy between the interpretations mentioned above.

-As Regulation No. 48 is the Regulation only with regard to the installation of lighting devices, the photometric characteristics are subject to the Regulations of individual lighting devices. In Regulation No. 7 or Regulation No. 77, however, there are no such requirements as in paragraph 6.12.9. of Regulation No. 48. In addition, forward facing parking lamps (max. 60 cd) have stricter requirements than front position lamps (max. 100 cd).

B. PROPOSAL

For solving this issue, clarifying the interpretation that those lamps are deemed to be parking lamps if they meet the requirement of position lamps, Japan suggests that the following amendments are necessary:

-change of photometric characteristics of parking lamps (Regulation No. 77) in a line with those of position lamps (Regulation No. 7), and,

-insertion of a sentence at the end of paragraph 6.12.9. of Regulation No. 48 (example: "The functioning of this lamp may also be performed by simultaneously switching on the front and rear position lamps on the same side of the vehicle. In this case, lamps that meet the requirement of front or rear (side) position lamps are deemed to be met the requirement of parking lamps.).
