

Transmitted by the expert from India

INDIA'S COMMENTS ON PROPOSAL FOR DRAFT AMENDMENTS TO
REGULATION No. 48
(Emergency Stop Signals (ESS))

A. PROPOSAL

The proposal by the Chairman of the joint GRE/GRRF expert meeting on ESS (ECE/TRANS/WP.29/GRE/2006/31) is acceptable in principle for India.

However, India suggests that in paragraph 6.22.7.3.1. the words " the vehicle speed is above 50 km/h and " should be deleted from the proposal.

B. JUSTIFICATION

As per India's understanding the conditions for generating the signal is to be done by GRRF. Hence the speed limit also should be covered in Regulations Nos. 13 and 13-H.

It is much simpler for the speed condition also to be built into the signal generation rather trying to control this externally.

Verification of compliance to the emergency lamp operation would be very difficult on a running vehicle. However, verification of signal being generated by the brake system as prescribed in Regulations Nos. 13 and 13-H can easily be verified while testing for compliance to braking Regulations. Verification of emergency stop signal frequency can be done in static conditions of the vehicle, after generation the signal as defined in Regulations Nos. 13 and 13-H. This verification procedure is in a line with the verification of flashing rate of direction indicators (para. 6.5.9. of Regulation No. 48).
