

OICA's comments on ECE/TRANS/WP.29/GRE/2006/42

Note: The modifications to the existing text of Regulation No. 48 (up to Supplement 2 to the 03 series of amendments) are marked in ~~strike through~~ and **bold** characters.

A. PROPOSAL

Paragraph 6.2.8., amend to read:

"6.2.8. Tell-tale

Tell-tale optional.

However, in the case where the whole beam or the kink of the elbow of the cut-off is moved to produce bend lighting, an operating tell-tale whether flashing or not is mandatory; it shall be activated in the event of a malfunction of the displacement of the kink of the elbow of the cut-off. It shall remain activated while the failure is present. It may be cancelled temporarily, but shall be repeated whenever the device which starts and stops the engine is switched on and off.

If one or more LED modules are used to produce the principal dipped-beam, an operating tell-tale whether flashing or not is mandatory. It shall be activated in the event that any one of the LED module(s) producing the principal dipped-beam fails. It shall remain activated while the failure is present. It may be cancelled temporarily, but shall be repeated whenever the device, which starts and stops the engine, is switched on and off. This paragraph does not apply in the case where all LEDs producing the principal dipped beam fail or are extinguished at the same time."

Paragraph 6.2.9., amend to read:

"6.2.9. Other requirements

....

Dipped-beam headlamps with a light source **or LED module(s) producing the principal dipped beam and** having a **total** objective luminous flux which exceeds 2,000 lumen shall only be installed in conjunction with the installation of headlamp cleaning device(s) according to Regulation No. 45. **8/** In addition, with respect to vertical inclination, the provisions of paragraph 6.2.6.2.2. above shall not be applied.

Only dipped-beam headlamps according to "

B. JUSTIFICATION

The text proposed above is aligned with the text already adopted by GRE at its fifty-sixth session (ECE/TRANS/WP.29/GRE/56, para. 29) and submitted to WP.29 November 2006 session as a part of ECE/TRANS/WP.29/2006/86.

Paragraph 6.2.8.

LEDs have proven a far better reliability than filament or gas-discharge lamps. An operating tell-tale is not justified in conditions comparable to the current situation where the driver is warned of a lamp failure because of the reduced beam. However, it is justified when the driver cannot detect the failure, e.g. when only one part of the beam has reduced illumination because of the failure of one LED module among several. The aim of the text proposed above by OICA covers this situation. The prescriptions about cancellation of the tell-tale respects the wording already agreed at GRE 55th session and adopted at GRE 56th session as mentioned in the introduction of the justification.

Paragraph 6.2.9.

OICA accepts the proposal from GTB to mandate headlamp cleaning devices for dipped-beam headlamps with LEDs > 2,000 lm. However, OICA prefers to keep the wording of the current text of the Regulation concerning the vertical inclination. It is indeed wiser to keep the normal practice to request performance criteria. The decision to equip LED headlamps with an automatic or a manual levelling device can be better judged according to the real performance of the headlamps and the criteria currently in practice.

A possible consideration of further definitions

At its 56th session, GRE agreed to replace "operational" by "operating" (ECE/TRANS/WP.29/GRE/56, para. 29 and Annex 2). Deleting "operational" makes sense because this word is not defined in Regulation No. 48. However, replacing it by "operating" is questionable. An operating tell-tale is defined in paragraph 2.18. of the Regulation as *"a visual or auditory signal (or any equivalent signal) indicating that a device has been switched on and is operating correctly or not"*. This definition implies that the tell-tale, if visual, must be illuminated when the device is in correct operation and the state of illumination must change if the device is not correctly operating.

In the case of paragraph 6.2.8., mentioning an "operating tell-tale" would imply that the tell-tale must be illuminated during all the time the vehicle is in bend lighting mode, which means that the driver would see a tell-tale being illuminated on the dashboard almost all the time during night travels, while there is no failure at all and the safety is improved compared to the normal situation.

This is probably not the objective aimed by the little change agreed at GRE 56th session.

OICA simply wants to draw the attention of the experts on the need to consider, in the future, possible addition of some definitions for e.g. "failure tell-tale" and "operational tell-tale".

- - - - -