

Japanese Comment on ECE/TRANS/WP.29/GRE/2008/3

The modifications to the current text of the Regulation are marked in **bold** characters.

We comment only on Regulation No. 4, which represents the regulations subject to amendment.

A. PROPOSAL

A.1. PROPOSAL TO AMEND REGULATION No. 4 – (Rear registration plate lamp)

(The following text is based upon draft Supplement 14 to the Regulation)

Insert two new paragraphs 5.5.3. and 5.5.4., to read:

5.5.3. A light source module shall be so designed that regardless of the use of tool(s), it shall not be mechanically interchangeable with any replaceable approved light source;

5.5.4. Filament lamps without approval according to regulation 37 are not allowed in the case of the use of non-replaceable light sources or light source modules.

B. JUSTIFICATION

We agree to prohibiting the use of filament lamps as non-replaceable light sources or light source modules for the purpose of eliminating the use of non-approved light sources of inferior quality. However, we propose the modification of the text as there are cases where light sources approved according to Regulation No. 37 are used as non-replaceable light sources due to the structural advantage.

It should be noted that a similar proposal had been made on Regulation No. 19 (Front fog lamps) and that the use of Regulation No. 37 light sources as non-replaceable light sources was approved as a result of deliberation at the GRE. See TRANS/WP29./GRE/2004/19/Rev.1.

W5Ws are actually used as non-replaceable light sources without any problems.

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