

Transmitted by the expert from India

INDIA'S COMMENTS ON PROPOSED DRAFT Regulation 48-H

Note: India suggesting the following amendments in draft Regulation 48-H

The suggested modification of the current text of the Regulation is marked in **bold** characters.

A.1. PROPOSAL

Paragraph 2.7.1.1 amend to read :

2.7.1.1 "Light source" means one or more elements for visible radiation, which may be assembled with one or more transparent / **semi transparent** envelopes and with a base for mechanical and electrical connection. ...

A.2. PROPOSAL

Delete Paragraph 2.14.6

A.3. PROPOSAL

paragraph 5.3 amend to read

5.3 For all light-signalling devices when fitted to the vehicle, including those mounted on the side panels, the reference axis of the lamp must be parallel to the ground and perpendicular to the median longitudinal plane of the vehicle in the case of side retro-reflectors, ~~and of~~ side-marker lamps **and of Side direction indicators**, and parallel to that plane in the case of all other light-signalling devices. In each.....

A.4. PROPOSAL

Paragraph 6.1.7.4 amend to read

Each vehicle.....

Main beam headlamp shall not switch ON or OFF automatically.

A.5. PROPOSAL

Paragraph 6.5.7 amend to read

Direction-indicator.....frequency.

Automaticmandatory **and deactivation shall be completed when the steering control returns to straight ahead condition.**

A.6. PROPOSAL

paragraph 6.7.1 to amend as follows

Device S3[orS4] category mandatory, except for chassis cabs and those N1 category vehicles with open cargo space **and soft top vehicles**

A.7. PROPOSAL

Paragraph 6.17.1 amend to read

Presence

Optional

A.8. PROPOSAL

Paragraph 6.18.1 amend to read

Presence

Optional

B.1 JUSTIFICATION FOR PROPOSAL A1.

There are some light sources used which have partially coated envelopes e.g. Coated Amber Bulbs. The envelopes of these sources are not completely transparent. Moreover many LEDs used as light sources, are also not transparent. As such we suggest including “Semi transparent” in the definition.

Philips Silver Vision Indicator Bulbs

SilverVision produces an amber colour light when lit and features a mirror surface when switched off. If your car has an orange / amber single function indicator bulb then the Philips Silver Vision light bulb will fit



B.2 JUSTIFICATION FOR PROPOSAL A2

Cl. No. is out of existing scope of 48-H

B.3 JUSTIFICATION FOR PROPOSAL A3.

Since Side Direction Indicator are also mounted on the side of the vehicle similar to side marker lamps, their axis also must be perpendicular to the median longitudinal plane.

B.4 JUSTIFICATION FOR PROPOSAL A4

India agrees that, main beam shall be operated only manually and not automatically. The suggested amendment is more specific and clarity.

B.5 JUSTIFICATION FOR PROPOSAL A5

India agrees for automatic deactivation of direction indicators; however India feels that deactivation condition is required to be specified for more clarity.

B.6 JUSTIFICATION FOR PROPOSAL A6

There are many difficulties for installing the High mounted Stop Lamp on “Soft top” range of vehicles, such as:

- * With the H M S L installed as per the guide lines, the entry and exit of the passengers at the rear is extremely difficult. There are chances of passenger head hitting with the lamp causing injuries.
- * In field usage, generally the rear canopy window is wrapped and tied to roof canopy for ventilation purpose. With this kind of usage, if the lamp is located externally on the roof structure, the lamp would be hidden behind the rear canopy and the very purpose of the lamp is defeated.

The relevant photographs illustrating the constraints are shown below:

<p>Photograph showing mounting of HMSL as per the requirement</p>	
<p>Chances of passenger head hitting with the lamp causing injuries.</p>	  



B.7 JUSTIFICATION FOR PROPOSAL A7 and A8

India suggest that side retro reflector and side marker shall be **optional** for the existing scope of R48H and considering the vehicle length and present practice as per ECE R 48.
