

Proposal regarding R13-H with regard to symbols

I. Proposal

A - Move symbols referenced in R13-H to Regulation No. 121 (Controls, tell-tales and indicators), and add the appropriate reference in R13-H.

For example, in Regulation 13-H, Annex 9, paragraph 3.4.1.3. Move the associated symbol to R121 and make the appropriate reference as proposed below:

3.4.1.3 Shall be identified by the symbol shown for ~~"ESC Malfunction Tell-tale"~~
~~below or the text "ESC":~~ **"Electronic stability control system malfunction"**
in Table 1 of Regulation No. 121.

Request GRSG to add the symbols in Table 1 of Regulation 121, as noted below:

No.	Column 1	Column 2	Column 3	Column 4	Column 5
	ITEM	SYMBOL 2/	FUNCTION	ILLUMINATION	COLOUR
...
43.	Electronic stability control system malfunction	 or ESC	Tell-tale	Yes	Yellow
44.	Electronic stability control system "OFF"	 OFF or ESC OFF	Control	Yes	
			Tell-tale	Yes	Yellow

B - Clarify that paragraphs 5.2.21.1.1 & 5.2.21.1.2 cannot refer to the same symbol graphical design. Currently, it could be interpreted that the same symbol design may be used, but with different colours, to differentiate between the two types of warning signals.

The current text reads as follows, with proposed change in **bold**:

5.2.21.1. Motor vehicles shall be capable of providing optical brake failure and defect warning signals, as follows:

5.2.21.1.1. A red warning signal, indicating failures defined elsewhere in this Regulation within the vehicle braking equipment which preclude achievement of the prescribed service braking performance and/or which preclude the functioning of at least one of two independent service braking circuits;

5.2.21.1.2. Where applicable, a yellow warning signal indicating an electrically detected defect within the vehicle braking equipment, ~~which is not indicated by the red~~ **indicated by a symbol of different graphical design than the** warning signal described in paragraph 5.2.21.1.1. above.

II. Justification

A - Regulation No. 121 is the regulation that sets the minimal requirements for symbols in vehicles. All symbols should be in that standard. GRRF should remove them from Regulation 13-H and request GRSG to add them in Table 1 of Regulation 121.

B - Currently, paragraphs 5.2.21.1.1 & 5.2.21.1.2 could be interpreted to allow the use of the same symbol graphical design to convey two separate messages, by changing the display colour of the symbol. Using a symbol with the same graphical design but with different colours to relay different messages could lead to confusion, particularly for the colour blind. For this reason, the warning symbols should be of different graphical design, and these appropriate symbols should be added to ECE Regulation 121.
