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World Forum for Harmonization of Vehicle Regulations**Working Party on General Safety Provisions****101st session**

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Item 8 of the provisional agenda

**Regulation No. 121 (Identification of controls,
tell-tales and indicators)****Proposal for amendments to Regulation No. 121
(Identification of controls, tell-tales and indicators)****Submitted by the expert from the International Organization of Motor
Vehicle Manufacturers ***

The text reproduced below was prepared by the expert from the International Organization of Motor Vehicle Manufacturers (OICA) commenting on ECE/TRANS/WP.29/GRSG/2010/20 about the symbol for automatic high beam functions. It is based on document ECE/TRANS/WP.29/GRSG/2011/6 and informal document GRSG-100-10, both distributed at the 100th session of the Working Party on General Safety provisions (GRSG). The modifications to the current text of the Regulation are marked in bold for new or strikethrough for deleted characters.

*In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106 and ECE/TRANS/2010/8, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Table 1, amend to read:

"

No.	Column 1	Column 2	Column 3	Column 4	Column 5
	ITEM	SYMBOL <u>2/</u>	FUNCTION	ILLUMINATION	COLOUR
...
3a	Headlamp high beams	 <u>1/</u> , <u>13/</u> , <u>18/</u>	Control	No	-
			Tell-tale	Yes	Blue
3b	Automatic high beam functions	 or  <u>1/</u> , <u>6/</u> , <u>13/</u> , <u>20/</u>	Control	No	-
			Tell-tale	Yes	-
...

1/ Framed areas of the symbol may be solid.

....

6/ Separate identification not required if function is combined with master lighting switch.

...

13/ Symbols employing five lines instead of four (and vice versa) may also be used.

...

18/ Symbol may be shown in other colours than specified in column 5 in order to convey different meanings according to the general colour coding as proposed in paragraph 5. of standard ISO.

...

20/ The supplementary letter(s) "A" or "AUTO" may be positioned relative on or adjacent to the outline of the symbol."

II. Justification

1. Canada proposed to add a new item No. 44 for Daytime Running Lamps (DRL). OICA's opinion is that the symbol is not necessary because such a signal is not required by Regulation No. 48 (Installation of lighting devices). The indication of the DRL status is left to the discretion of the vehicle manufacturer in Regulation No. 48 and it would be design restrictive to add one into Regulation No. 121.

2. OICA's comments on the proposal from Canada to add a new item No. 46 for automatic upper beam switching are as follows:

(a) *Numbering*: OICA believes that a such new item would be better placed as a new item 3b. This would make it related to the existing item 3, a more logical place for such high beam warning.

(b) *Title of the item*: It is recommended to use a denomination covering all the new technologies addressed by the recent amendment to Regulation No. 48, i.e. automatic high beam switching, as well as all the possible high beam patterns and switching which are regulated in this text (see document ECE/TRANS/WP.29/GRE/2010/40). The symbols proposed by Canada conform to the concerned ISO standard.

(c) *Illumination*: in conformity with the text proposed by the Working Party on Lighting and Light-Signalling (GRE) for Regulation No. 48, the control does not need to be illuminated, while the tell-tale does.

(d) *Colour*: colours for this function are not regulated in Regulation No. 48.

3. The proposal from Canada to add a new item No. 47 for automatic lower beam is not necessary as the automatic switching of the low beam is only an option in the current text of Regulation No. 48, in case the manufacturer opts for DRL equipment, versus alternative options.

4. References to the footnotes:

(a) Item 3a (new reference): new reference to the existing footnote 18/. Colours others than the one indicated in column 5 may be used when the symbol contributes to indicating the status of new technologies such as automatic high beam functions. In this case, the manufacturer may use the tell-tale of item 3a, transformed as 3b by the addition of the appropriate letters, and in a colour other than blue to not confuse to the driver.

(b) New item 3b, reference to the existing footnote 1/. As for numerous other symbols used in the table, it is allowed to integrate the symbol in a framed area.

(c) New item 3b, reference to the existing footnote 6/: It is reasonable to permit identification on the master lighting switch itself if so requested by the manufacturer.

(d) New item 3b, reference to the existing footnote 13/: it seems reasonable to permit the use of a symbol with 4 or 5 lines as appropriate, as it is already the case for the parent item 3a (new reference).

(e) New item 3b: reference to a new footnote 20/: some vehicles in current production use the dedicated symbol with the letter "A" positioned relative to the outline of the symbol. Experience shows that such positioning is convenient for the user and problems of confusion or misunderstanding have never been reported.

5. GRSG at its ninety-ninth session supported the principle that the symbols addressing automatic switching of the driving beams should be first addressed by GRSG as there is necessary coordination with the work performed at GRE. The other items proposed by Canada in ECE/TRANS/WP.29/GRSG/2010/20 would then be considered at a later stage.

6. The proposal above aims at clarifying the meaning of the new footnote 20/ proposed in ECE/TRANS/WP.29/GRSG/2011/6.

7. The most important information for the driver with the symbol in item No. 3 is indeed the driving beam function, and this shall remain the priority of this symbol. In addition, the sign to indicate to the user that the system has switched to automatic mode shall be clear and the adjunction of such sign shall not jeopardise the main information.

8. The proposal above clarifies where the letter(s) "A" or "AUTO" can be positioned relative to the symbol.