Transmitted by the expert from IMMA

Informal document **GRE-70-21** (70th GRE, 21-23 October 2013, agenda item 5(e))

Proposal for collective amendments to Regulations Nos. 3, 4, 6, 7, 19, 23, 38, 50, 77, 87, 91, 98, 104, 112, 113, 119 and 123.

IMMA proposal for amendment to ECE/TRANS/WP.29/GRE/2013/55 clarifies the Italian proposal, to align the regulations for installation requirements for the various devices, with respect to the verification of the specifications on the vehicle against those on the device.

I. Proposal

"Paragraph 5., amend to read:

5. General specifications

The requirements, **pertinent to each lamp and verifiable on the lamp** contained in sections 5 "General specification" and 6 "Individual specifications" and in the Annexes referenced in the said sections of Regulations Nos. 48, 53, 74 and 86 and their series of amendments in force at the time of application for type approval shall apply to this Regulation."

II. Justification

Many of the requirements given in General Specifications and Individual Specifications (as proposed in ECE/TRANS/WP.29/GRE/2013/55) can be verified only on the vehicle and cannot be verified on the device. For example:

- Arrangement
- Position
- Geometric visibility
- Orientation
- Electrical connections
- "Circuit-closed" tell-tale
- Other requirements

In fact, the only requirements of Regulation No. 48 (and Regulations Nos. 53, 74, 86) that can be verified at the component level are:

1. Colour (Even this may pose problems if the multiple colour options are available, e.g amber or white colour for front position lamps for L3 category).

2. Requirements of combined lamps, group lamps, reciprocally incorporated lamps etc.
