UN Regulation No. 46
Devices for indirect vision and motor vehicles with regard to the installation of these devices

1. Issue

A Camera-Monitor-System (CMS), which is offering special features, was presented to some Type-Approval Authorities (TAA). The CMS can adapt the field of vision by providing an automated panning functionality. The automatic modification of the field of vision (main exterior rear-view, class II) is presented to the driver while driving. For example a combination of motor vehicle and trailer modify the field of vision while driving around a bend. The driver does not see the field of vision as it was adjusted to the position of motor vehicle and trailer standing in a straight line, but a field of vision adjusted automatically to the current position of the trailer. The functionality may compensate the disadvantage of Camera-Monitor-Systems compared to mirrors and also uses the technology to improve the field of vision of the driver.

UN Regulation No. 46 does not consider the situation that a combination motor vehicle and trailer does not stand in a straight line but is driven around a corner. This can for instance clearly be taken from the figures that explain the location and dimensions of the fields of vision. There are no stipulations in the Regulation that address a combination of vehicles.

Figure 5 of the Regulation Field of vision of Class II mirrors

One TAA granted an approval for a CMS provided with the functionality described above. The other TAA accepted this approval due to the mutual recognition.

When discussing the validity of the approval granted for the CMS the TAA argued that the functionality is mentioned in a special section of ISO 16505. There are some references to ISO 16505:2015 made in the Regulation nevertheless there is no reference to the special section of that standard.

2. Suggestion

Due to the different understanding of the stipulations Germany seeks advice from GRSG.

It should be decided if this automatic adaptation of the field of vision may be approved according Regulation No. 46 or if this functionality is not in line with the Regulation.

Furthermore it should be discussed if GRSG deems it to be necessary to have a more detailed discussion on this topic aiming at a modification of the Regulation.