



COMMENT ON DOCUMENT TRANS/WP.29/GRE/2001/13/Rev.1

(Installation of lighting and light-signalling devices)

CLCCR is of the opinion that, as regards retro-reflective lines and contour markings, this proposal, as currently drafted, does not fully utilise the potential benefits to be gained from the use of such devices on vehicles of categories M₂, M₃, N and O.

In paragraphs 6.14.4.2., 6.15.4.2., 6.16.4.2. and 6.17.4.2. of the draft proposal, the height above the ground of the device is limited to a maximum of 900mm (exceptionally 1500mm). Note that in Regulation 104, the maximum permitted height is 1500mm (exceptionally 2100mm in the case of retro-reflective strips (lines)). At a height of 900mm the majority of the largest N and O category vehicles would not have any structure on which to mount the strips or contour marking, and even at 1500mm there is likely to be a shortage of suitable structure.

Typically, in the case of the largest vehicles within the categories mentioned above, the vehicle height is 4000mm therefore the contour marking would not provide an overall outline of the vehicles in question. In Appendix 2 to Annex 9 of Regulation 104, the examples of contour marking show the retro-reflective material applied at maximum height, maximum width and maximum length of the vehicles.

The application of retro-reflective markings, as shown in Regulation 104, would have particular benefits in the case of those vehicles where vehicle design makes it impossible, or impracticable, to mount end-outline marker lamps at the maximum height of the vehicle.

In the case of, for example, demountable bodywork or uncoupled trailers, neither of which would have a power source for those lighting devices mounted on them, retro-reflective marking provides an opportunity to greatly increase their conspicuity.

For the reasons given above, CLCCR wishes to propose the following amendments to TRANS/WP.29/GRE/2001/13/Rev.1, in order to bring the text in line with that for end-outline marker lamps:

Paragraphs 6.14.4.2., 6.15.4.2., 6.16.4.2. and 6.17.4.2., amend in each case to read:

“In height: At the maximum height compatible with the requirements relating to the design and operational requirements of the vehicle, but in no case less than 250mm above the ground.”

CLCCR also wishes to make known its support for those Contracting Parties that favour restricting rearward facing markings to the colour red.