

Japan's Comment on the Draft GTR (Dated 25 March 2002) for Installation of Lighting and Light-Signaling Devices

Submitted by the Experts from Japan

Concerning the Draft GTR, Japan wishes to have the following matters verified or amended:

Para. 1. SCOPE

Please verify if public-use vehicles such as ambulances, fire engines, police cars, and garbage trucks are included as vehicles applicable to this Draft GTR.

Justifications

Public-use vehicles such as ambulances, fire engines, police cars, and garbage trucks are equipped with various special lamps unique to each country. When compared to ECE R48, "public works vehicle" seems to be included in the scope of this GTR.

Para. 6.5. DIRECTION INDICATOR LAMP

Para. 6.5.2. Number

Japan proposes mandatory installation of two "Middle-side direction indicators" on the N2 vehicle exceeding 7.5 tons GVW and on any N3 vehicle (taken from R46 and R13).

The details of and justifications for this proposal are as per the 48th GRE Informal Document №7.

The paragraphs and figures to be amended in connection with this proposal are 6.5.2; 6.5.3, 6.5.4; 6.5.4.3; 6.5.5; 6.5.5.1; 6.5.5.2; 6.5.5.3; and Figure 2.

Para. 6.5.5. Geometric visibility (see Figure 2.)

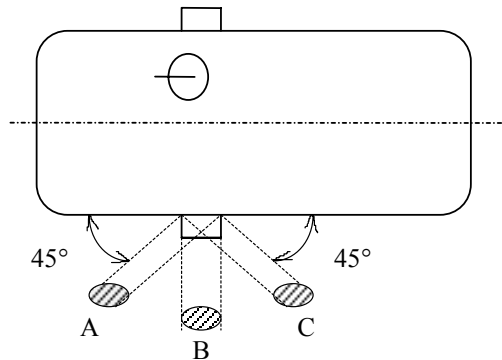
Para. 6.5.5.3. For the direction indicator to be considered visible throughout the angles of geometric visibility one of the following shall be met :

In the 3rd informal GRE Japan was requested to clarify the Japanese visibility measurement method for side direction indicator lamps. The following is our response.

(ANSWER)

Side direction indicators are measured from 45 degrees rearward, and their measured visible luminous area is required to be at least 10 cm².

In the case of “Middle-side direction indicators”, however, the measurement is performed from 45 degrees forward, from the right angle, and from 45 degrees rearward, and their measured visible luminous area is required to be at least 40 cm² in all of the three directions as shown below.



Para. 6.7. STOP LAMP

Para. 6.7.7. Electrical connections

While GRRF is yet to reach a conclusion, Japan proposes mandatory automatic lighting of the stop lamps during operation of the retarder (with a capacity of decelerating the vehicle at more than 2.2 m/s²).

Justifications

Described in the 48th GRE Informal Document №8

Para. 6.9. FRONT POSITION LAMP

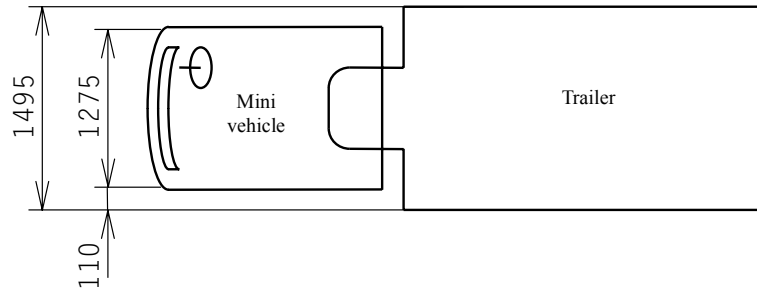
Para. 6.9.1. Presence

Although Japan previously proposed mandatory installation of front position lamps on all trailers, after in-depth examination Japan modifies its previous proposal and newly proposes "mandatory on trailers over 1,500 mm wide" and "optional on trailers not more than 1,500 mm wide".

Justifications

There exists a mini vehicle whose overall width is 1,275 mm in Japan. While front position lamp of a trailer is required to be installed not more than 150 mm from the adjacent extreme outer edge of the trailer, we believe that a trailer without front position lamps should not project more than 150 mm outward of its towing vehicle's extreme outer edge.

Assuming a mini vehicle with an overall width of 1,275 mm is to tow a trailer, as the late chairman proposed, the width of the trailer without front position lamps should be less than 1,500 mm. As shown in the figure below, this will put the maximum amount of projection at about 110mm, which, in our opinion, is acceptable.



Para. 6.9.4. Position

Para. 6.9.4.1. In width:

Japan proposes the elimination of the specification on the distance between two position lamps for all vehicle categories.

Justifications

Although the Draft GTR specifies no inter-lamp distance for M1 and N1 category vehicles, it does require the minimum 600 mm inter-lamp distance for other vehicle categories. Japan believes that there will be no safety risks even if this requirement is eliminated for all vehicle categories.

Para. 6.10. REAR POSITION LAMP

Para. 6.10.4. Position

Para. 6.10.4.1. In width:

Japan proposes the elimination of the specification on the distance between two tail lamps for all vehicle categories.

Justifications

Although the Draft GTR specifies no inter-lamp distance for M1 and N1 category vehicles, it does require the minimum 600 mm inter-lamp distance for other vehicle categories. Japan believes that there will be no safety risks even if this requirement is abandoned for all vehicle categories.

Para. 6.11. REAR FOG LAMP

Para. 6.11.4. Position

Para. 6.11.4.2. In height:

Japan proposes to delete the following sentence.

“For vehicles described in 2.27, the maximum height may be increased to 1,200 mm.”

Justifications

In the Japanese regulation, the maximum height of 1,000 mm is required for all vehicles.

However, Japan may reconsider its position depending on the subsequent definition of “very heavy-duty off-road vehicles” in 2.27.
