

## Rationale

The Clepa would like to draw your attention to one peculiarity that could prove detrimental to innovation in a near future : the non-replaceable light sources are allowed for the front lighting functions, but their use is made difficult by a provision in paragraphs 2.1.4. and 2.1.5. of Draft document TRANS/WP29/GRE/2002/18/Rev.1\* that makes them economically non-viable :

### **They must be part of a light source module.**

A light source module is composed of a support where non-replaceable light sources are affixed. The light source module can be removed from the lighting unit only with the help of a tool. It might be a deterrent to LEDs, because :

- 1) Transforming a LED that needs to be welded into something removable is against nature,
- 2) Cost goes up because connectors are needed for the replacement of the module
- 3) Durability is endangered because of the connectors
- 4) Cost goes up because bonnets are needed
- 5) Cost goes up because watertight bonnets are needed
- 6) Durability is endangered because watertightness of many bonnets is always questionable
- 7) Carmakers need to provide access to the bonnets, and space is a scarcity around lamps

We also remember that the SAE is initializing a task force on DRL lowbeams. The Clepa acknowledges the value of the light source modules that were recently introduced in the ECE Regulation No. 48, but prefers to offer their use as an option rather than a mandatory feature.

## Proposal

TRANS/WP29/GRE/2002/18/Rev1 continues to read (deletions have strike-through, additions in bold):

- 2.1.4. *the category, as listed in Regulation No. 37 or 99, of replaceable light source(s) used, **if any, and/or the description of the non-replaceable light sources not being part of light source(s) module(s), if any;***
- 2.1.5. *if the system is equipped with one or more light source modules:*
- 2.1.5.1. *specific information sufficient to permit identification of the non-replaceable light source(s) used, including the part number assigned by the light source manufacturer;*
- 2.1.5.2. *specific information sufficient to permit identification of the light source module(s);*
- 2.1.5.3. *identification of the installation unit(s) of which said light source module(s) is/are a part;*
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- 5.3. *The system shall be equipped with:*
- 5.3.1. *one or more replaceable light source(s) approved according to Regulation No. 37 or 99,*
- 5.3.1.1. *where*
- (a) *the lamp holder shall conform to the dimensional characteristics given on the data sheet of IEC Publication No. 600 61-2, as referred to in the relevant light source Regulation,*
- (b) *the light source must fit easily into the lighting unit,*
- (c) *the component(s) to which a light source is assembled shall be so made that, even in darkness, the light source can be fitted in no position but the correct one;*
- 5.3.2. *and/or, one or more light source modules, where, in the case of a light source not being approved according to Regulation No. 37 or 99, the requirements of Annex 8 to this Regulation shall apply*
- 5.3.3. and/or one or more non-replaceable light sources**
- 5.3.4. and/or any combination according to 5.3.1. through 5.3.3. above**

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Annex 8 PART B: LIGHT SOURCE MODULES WITH OTHER LIGHT SOURCE(S)

10. ~~The technical requirements of paragraphs 3. through 9. of part A of this annex apply, where relevant~~ **Same as Part A, but some paragraphs may not apply**

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\* Note by the secretariat: Draft document TRANS/WP.29/GRE/2002/18/Rev.1 is still under discussion in GRE informal meeting group on AFS