

PROPOSAL FOR DRAFT 03 SERIES OF AMENDMENTS TO REGULATION No. 48
(Installation of lighting and light-signalling devices)

Note: With this document OICA suggests some modifications to the TRANS/WP.29/GRE/2005/44, that was prepared by the Chairman of the GRE Informal Working Group on Conspicuity Markings. The text modified by OICA is marked in **bold** characters.

A. PROPOSAL

Inserted paragraph 2.7.16.4., amend to read:

["2.7.16.4. retro-reflecting materials used for other purposes in compliance with national requirements, e.g. advertising, etc., **installed by the vehicle operator.**"]

Paragraph 6.21.1.2.2.2., to be deleted (including the footnote */):

6.21.1.2.2.2. — line markings on the cabs of tractor units for semi-trailers */

Paragraph 6.21.4., amend to read:

- 6.21.4. Position
- 6.21.4.1. Width
- 6.21.4.1.1. The conspicuity marking shall be as close as practicable to the edge of the vehicle.
- 6.21.4.1.2. The **cumulative** horizontal length of the conspicuity marking elements, as mounted on the vehicle, should **equates to identify** at least 80 per cent of the overall width of the vehicle, excluding any horizontal overlap of individual elements.
- 6.21.4.1.3. However, if the manufacturer can prove to the satisfaction of the authority responsible for type approval that it is impossible to achieve the value referred to in paragraph 6.21.4.1.2. above, **the value the cumulative length may be reduced to a suitable value acceptable by the authority [60] per cent** and shall be indicated in the communication document and test report ***/**.
- 6.21.4.2. Length
- 6.21.4.2.1. The conspicuity marking shall be as close as practicable to the ends of the vehicle and reach to within **[400]/[600]** mm of each end of the vehicle (or cab in the case of tractor units for semi-trailers).
- 6.21.4.2.1.1. for motor vehicles, each end of the vehicle, or in the case of tractors for semi-trailers the each end of the cab;
- 6.21.4.2.1.2. for trailers, each end of the vehicle (excluding the drawbar).
- 6.21.4.2.2. The **cumulative** horizontal length of the conspicuity marking elements, as mounted on the vehicle, excluding any horizontal overlap of individual elements, should **equates to identify** at least 80 per cent of:
- 6.21.4.2.2.1. for motor vehicles, the length of the vehicle, or in the case of tractors for semi-trailers the length of the cab;
- 6.21.4.2.2.2. for trailers, the length of the vehicle (excluding the drawbar).
- 6.21.4.2.3. However, if the manufacturer can prove to the satisfaction of the authority responsible for type approval that it is impossible to achieve the value referred to in paragraph 6.21.4.2.2. above, **the value cumulative length may be reduced to a suitable value acceptable by the authority [60] per cent** and shall be indicated in the communication document and test report ***/**.
- 6.21.4.3. Height
.... "
- 6.21.5. Visibility (OICA sees difficulties to make measurements defined in para. 6.21.5.)

*/ ~~This provision does not apply until [5] years after the official date of entry into force of the 03 series of amendments to this Regulation.~~

B. JUSTIFICATION

- **OICA still asks for safety justification to mandate strips on the side of the cab** (nothing is requested in US regulation, no information in the EU cost/effectiveness analysis on the location of impact on the side (cab or semi-trailer).

When a vehicle is in motion in reduced ambient light condition, **its lights are on (headlamp, front position, end outline marker lamp, side retro reflectors, side marker lamps), so the cab can be seen.** The accidentology data didn't take care of accident that occurred while vehicles were stationary, which is the only case that could justify such a mandatory requirement.

It is also to be stressed that, as written in the proposal, a vehicle unit (tractor + semi-trailer) could lead to have **different colors of the strips at the side** (one for tractor, one for trailer). Couldn't this lead to misinterpretation for road users?

- Depending on the shape of the cab, the height of the cab, the height of fitment of the strips and considering that the strips should be fitted at one height only (to take care of industrial constraints and of a clear signal image for the road users), **the length of the cab we would be able to identified represent 20 to 70% of the cab** (we excluded cab with lateral windows for which even 20% is not achievable).

→ **Due to lack of safety justification and problem of contour marking installation on the cabs, OICA ask tractors to be exempted from mandatory side marking.**

- **We oppose the new interpretation of the Chairman of the 80% rule**

the proposition says: "**The cumulative horizontal length of the conspicuity marking elements, as mounted on the vehicle, should equate at least 80 per cent of the overall width (or length) of the vehicle**"

Our understanding was, with the current 104 Regulation, that 80% of the length or width of the vehicle should be identified (either by straight line or dotted line). Identification does not mean the length of strips to be fitted. This interpretation de facto will not allow dotted lines.

→ **The rule should be kept as it is today: identification of 80% of the dimension of the vehicle.**

- We do not agree with the logic that in long term, 80% of the length and the width of **all vehicles** should be fitted with strips, even if the structure, or the shape of the vehicle make it difficult or impossible to fulfil this 80% value. The aim of the proposition was to ask vehicle manufacturers or bodybuilders **to add specific support to fit these strips. This has never been taken care of in the EU cost/effectiveness study and would change the cost figures.** The only possibility that is given in the proposition is to have a 60% value authorized during the 5 first years after the entry into force of the regulation to give time to add specific support to fit strips.

- The regulation **should allow exemption in the text for specific vehicles** such as concrete malaxer, timber transport, ..., list to be completed by CLCCR together with the % that these vehicles will represent.

→ **The comment of OICA was just to mention that not 100% of vehicles can fulfil the 80% of the rule. The regulation should take care of this low % of vehicles by authorising derogation.**

- The **visibility requirements seem difficult to quantify**: how the observer can be sure he sees 80% of the conspicuity marking? Do we know if we have dark chambers that are big enough to allow the required test?

→ **OICA ask to review the visibility specifications.**

- **OICA would like to remind that conspicuity markings should become mandatory in R48, only when the questions of applicability, durability of strips are addressed properly in R104. So a first amendment of R104 is necessary before adoption and implementation** of the amendment of R48.

R104, as agreed in the ad hoc group, should be amended to take care of **bending test (with at least 40 000 occurrences), karsher washing, and temperature resistance** (either for the characteristics of the strips and for the adherence of the strips on different supports). **Power washing test like proposed by CLEPA in the informal document GRE-55-3 is no sufficient.** We also would like to stress that R104 should be aligned with the needs of fitment on power driven vehicles as covered in R3.

→ **OICA ask for additional prescriptions of strips durability in R104.**
