Transmitted by the experts from Germany

Informal document No. **GRSG-94-25** (94th GRSG, 21-25 April 2008 agenda item 6.)

Comments to working document ECE/TRANS/WP.29/GRSG/2008/3
for changing the existing requirements and measurement procedures for camera-monitor systems in Regulation N° 46
(Devices for indirect vision)

Germany would like to point out the following comments to working document ECE/TRANS/WP.29/GRSG/2008/**3**:

a) The currently existing measurement procedure is just introduced in the industry and in the test laboratories. Presently it has been shown that it can work adequate. The experience and possible improvements of the current procedure should be accumulated by more labs than one or two and should be transferred to the experts in the standardization organisations for considering it in their revisions of the standards.

b) Definitions (like luminance contrast, luminance difference, light sources and others) are defined in the ISO standards and should not be defined in a other direction than by the experts in the ISO standardization committees.

c) A document that is reflecting the evidence for the new proposed changes is missing. A validation document should be presented for the proposed changes, especially for Annex 9.

d) In summary the current procedure and requirements for the assessment of camera-monitor devices belongs to the standardization processes on international level. Our proposal is to address this standardization items to the responsible standardization committees like ISO TC 22/SC 13/ WG8, that is also in charge for ISO 15008 and ISO TC159/SC4/WG2(Human factors engineering-Visual display requirements). ISO 15008 is addressing the requirements for visual information presentation in vehicles. It should be extended to the requirements and measurement methods for camera-monitor devices and their applications. In the future regulations and directives for camera-monitor devices these regulations should be refer to these standards as usually practiced.

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