PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 7

(Position, stop and end-outline marker lamps)

Transmitted by the Experts from Germany and Italy

Note: The text reproduced below was prepared by the experts from Germany and Italy, on the basis of the previous GTB proposal (TRANS/WP.29/GRE/2001/29), in order to consider the possibility of using changeable "light source modules" instead of non-replaceable light sources. This would allow replacing a defective module only, instead of a complete lamp, with obvious advantages. To facilitate the initial consideration, the proposal was prepared on the basis of Regulation No. 7 and the inserted text is shown in bold type.

Note: This document is distributed to the Experts on lighting and light-signalling only.
A. PROPOSAL

Paragraph 1.6., amend to read:

"1.6. "Front and rear position (side) lamps, stop-lamps and end-outline marker lamps" means lamps, which differ in each said category in such essential respects as:

The trade name or mark,

The characteristics of the optical system, (levels of intensity, light distribution angles, category of filament lamp, light source module, etc.),

The system used to reduce illumination at night - in the case of stop-lamps with two levels of intensity."

Paragraph 2.2.2., amend to read:

"2.2.2. A brief technical description stating, in particular, with the exception of lamps with non-replaceable light sources:

* the category or categories of filament lamp prescribed; this filament lamp category shall be one of those contained in Regulation No. 37;

or

* the light source module specific identification code."}

Paragraph 3.2., amend to read:

"3.2. With the exception of lamps with non-replaceable light sources it must bear a clearly legible and indelible marking indicating:

* the category or categories of filament lamp prescribed; and/or

* the light source module specific identification code."

Paragraph 3.4., amend to read:

"3.4. In the case of lamps with non-replaceable light sources or light source module(s), the lamp shall bear the marking of the rated voltage."

Insert new paragraphs 3.5. to 3.5.3., to read:

"3.5. Light source module(s) submitted along with the approval of lamp:

3.5.1. Shall bear the trade name or mark of the applicant; this marking must be clearly legible and indelible;

3.5.2 Shall bear the specific identification code of the module; this marking must be clearly legible and indelible.

This specific identification code shall comprise the starting letters "MD" for "MODULE" followed by the approval marking without the circle [and, if necessary for differentiation, the additional symbols prescribed in paragraph 4.2 below]; this specific identification code shall be shown in the drawings mentioned in paragraph 2.2.1. above. The approval [number] [marking] must not be the same as on the lamp used, but both [numbers] [markings] shall be from the same holder.

3.5.3. Shall be marked with the rated voltage "}
Insert new paragraphs 5.5. to 5.6., to read:

"5.5. Light source module

5.5.1. The [interchangeability] [replacement] of light source modules shall be secure and safe in position, orientation and fixation.

5.6. The light source module(s) shall be tamperproof and/or modification protected."

Annex 2, Item 9., amend to read:

"9. Concise description: 3/ 
By category of lamp:
Colour of light emitted: red / selective yellow / white 2/ 
Number and category(ies) of filament lamps: ............................
Light source module: Yes / No 2/
Light source module specific identification code: ............................"

Annex 3,

Insert a new example 7., to read:

"7. Light source modules

MD E3 17325 S3

The device bearing the identification code shown above composed by the approval mark is a light source module for a high mounted stop lamp (S3) approved in Italy (E3) under approval number 17325 pursuant to Regulation No. 7, which is approved in this case together with the high mounted stop lamp (S3) under the same number."

* * *

B. JUSTIFICATION

At the application of non-replaceable light sources the lamp unit must be changed completely in the case of failure. For saving costs and resources, industry asks for the possibility of the application of changeable light source modules. This introduces the possibility to replace a defect module only and not the complete lamp device, which is a main environmental aspect, also with regard to the recycling requirements.

In line with the above, GTB discussed and approved at its ninety-first session, held in Rome from 9 to 11 May 2001, the proposal for amendments to Regulation No. 7 contained in document TRANS/WP29/GRE/2001/29.

This proposal was discussed at the forty-eighth GRE session during which some modifications were requested by the German delegation (see Informal Document No. 25 of this session). Italy opposed the modification requested by Germany and finally the experts of Germany and Italy were requested to prepare a common proposal for the forty-ninth GRE session.
The proposal contained in the previous pages is the German-Italian common proposal, based mainly on the previous GTB proposal with some changes aimed at an improved level of safety as far as the use of the "correct module" in the "correct lamp" is concerned and at a more clear implementation of the markings on the module and on the lamp.

This marking shall be given by a specific identification code, which is in principle the approval number of the lamp firstly approved with that module.

However, a light source module can be used for different lamps under the sole condition that all those lamps are approved by the same approval holder (i.e. even if the identification code is not the same as the approval marking of the lamps and independently from the fact that the function they perform is different from that of the lamps with which the module was originally approved).

This should guarantee, that the responsibility for the light source module should be solely of the device manufacturer who is the holder of the approval.

This should give the manufacturer and the authorities a legal protection against the misuse of light source modules.

It was never the intention to introduce or rather to allow general light source modules for general use and it should always be clear that the lamp manufacturer is solely responsible for the lamp and therefore also for the used module!

Note:

When proposing the word "tamperproof", the following was considered:

In the latest CONCISE OXFORD DICTIONARY there are the following definitions:

- TAMPER: meddle or interfere with; make unauthorized changes in ......
- TAMPER-PROOF: made so that it cannot be tampered with.

In this context and for clarification the wording "... and/or modification protected" was added.

____________________