PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 37

(Filament lamps)

Transmitted by the expert from Germany

Note: The text reproduced below was prepared by the expert from Germany, in order to provide also for stop-lamps the benefits of replaceability and safety requirements of Regulation No. 37.

Note: This document is distributed to the Experts on Lighting and Light-Signalling only.
A. PROPOSAL

Annex 1, list of categories of filament lamps and their sheet numbers, remove footnote **/ and remove from all filament lamps emitting red light the reference to the footnote **/.

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B. JUSTIFICATION

GRE introduced to Regulation No. 37 a footnote stating that red replaceable filament lamps shall not be used in the stop lamp function.

Germany proposes to remove that footnote for the following reasons:

1. Today it is allowed and practised to use in stop-lamps non-replaceable light sources emitting red light, e.g. LEDs and filament lamps. In the near future also light source modules containing red filament lamps will be permitted. Nevertheless replaceable filament light sources emitting red light as regulated by ECE Regulation No. 37 are exempted because of the above mentioned footnote. As safety-relevant requirements of Regulation No. 37, like the colour coating endurance test (which was introduced to Regulation No. 37 on request of the United Kingdom and Germany at the 49th GRE session), do not apply for non-replaceable light sources or light source modules it would increase safety to give also the opportunity to use replaceable red filament lamps regulated by Regulation No. 37.

2. In addition to the ensured colour coating endurance replaceable lamps as regulated by Regulation No. 37 would also add to the drivers safety the benefit of quick and easy replacing of failed light sources.

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