

Informal document No. WP.29-133-18

**(133rd WP.29, 22-25 June 2004,
Agenda items 4.2.2 and 4.2.4)**

ENGLISH

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Comments in regards to:

- Proposal for Draft Supplement 10 to the 09 Series of Amendments to Regulations No. 13
(document TRANS/WP.29/2004/38);**
- Proposal for Draft Supplement 3 to Regulations No. 13-H
(document TRANS/WP.29/2004/40)**

Transmitted by the Russian Federation

Taking into account that the said documents were adopted by GRRF and not having objections concerning their contents, the Russian Federation feels necessary to draw up the attention of WP.29 to the certain inconsistency of the proposal for Draft Supplement 10 to the 09 Series of Amendments to Regulations No. 13 (document TRANS/WP.29/2004/38).

The proposal concerns generation of a signal to illuminate the stop lamps. According to the draft proposal, in case of endurance braking system, such a signal may be suppressed when the retardation generated is less than 2.2 m/s^2 (p. 5.2.1.30.2.2), and in case of “automatically commanded braking” a signal may be suppressed when the retardation generated is less than 0.7 m/s^2 (p. 5.2.1.30.3). The similar provision is proposed to be included into the Regulations No. 13-H (document TRANS/WP.29/2004/40).

In spite of the fact that the said systems differ functionally and are used on vehicles of different categories, to the opinion of the Russian Federation, the retardation levels at which the generated signal causes illumination of the stop lamps have to be equal for any kind of system being used for reducing of vehicle speed.

Perhaps the solution has to be considered together with the issue of equipping of vehicles by the so-called “informative braking signaling systems” that change the intensity of illumination depending on the level of retardation. In this regard the Russian Federation wishes to draw up attention to the informal document No. GRE-52-35/Corr., regarded to the research performed on the said subject, introduced by the Russian Federation at the past 52nd GRE session.

In view of stated, the Russian Federation proposes to WP.29 to return to consideration of an issue of algorithm of switching on and informative ability of stop lamps by GRRF and GRE, which, probably, should establish an informal ad-hoc group.