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**ECONOMIC COMMISSION FOR EUROPE**

INLAND TRANSPORT COMMITTEE

World Forum for Harmonization of Vehicle Regulations (WP.29)

Working Party on Lighting and Light-Signalling (GRE)  
(Fifty-second session, 30 March - 2 April 2004,  
agenda item 16.)

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 19

(Front fog lamps)

Transmitted by the expert of Germany

Note: The text reproduced below was prepared by the expert from Germany, in order to clarify its position with regard to the type approval of front fog lamps of the sealed beam type.

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

**A. PROPOSAL:**

2. APPLICATION FOR APPROVAL

Paragraph 2.2.1., amend to read:

"2.2.1. a brief technical specification including the category of filament lamp( s); it shall be H1, H2, H3, H4, H7, H8, HB3, HB4, H27W/1, H27W/2, H10, H11 or H12 filament lamp(s) as specified in Regulation No. 37;"

Annex 1, item 9., amend to read:

"9. Brief description: .....

Category as described by the relevant marking: 2/ B, B/, BPL, B/PL

Number and category of filament lamp(s) .....

Colour of light emitted: white/yellow 2/."

\* \* \*

**B. EXPLANATION:**

Regulation No. 19, Front fog lamps, was drafted by GTB in 1967. It was approved by WP.29 at its thirtieth session in March 1970, and entered into force on 1 March 1971.

Since then, the text of Regulation No. 19, which presently exists as Revision 3, has been updated regarding test procedures and additional tests as well administrative provisions. The principal photometric requirements have largely remained unchanged.

During a review of the existing text, GTB has encountered an issue which may have legal and technical implications affecting the application of the Regulation by Contracting Parties to the 1958 Agreement: According to paragraph 2.2.1. the application for type approval of a front fog lamp shall be accompanied by "... a brief technical description. If the device is not of the sealed-beam type, the category of filament lamp(s) shall be specified; it shall be ....."

Discussion in GTB has shown that there may be interpretations of this paragraph which would permit front fog lamps of the sealed-beam type or even with light sources other than filament lamps or with non-replaceable light sources. On the other hand, an interpretation based on the history of Regulation No. 19 tends to conclude that it was never intended to permit light sources other than filament lamps for front fog lamps.

At its ninety-fifth session in May 2003, GTB came to the conclusion that, in the revised version of Regulation No. 19:

- different interpretations of the Regulation should be excluded;
- reference to the sealed-beam type should therefore be deleted.

It was also recommended that, during the time period until the entry into force of the revised version of Regulation No. 19, means should be found to avoid different interpretations which could lead to a distortion in competition and be counterproductive with regard to replacement of light sources.

GTB would therefore like to request GRE to propose and support an agreement where Contracting Parties applying Regulation No. 19 would engage not to grant new type approvals for front fog lamps of the sealed beam type.

At the fifty-first GRE, the experts of Germany were requested to prepare a proposal for the fifty-second session of GRE.

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