

Japan's comment on TRANS/WP.29/GRE/2004/6 (Harmonized Passing Beam Headlamp)

(Transmitted by the expert from Japan)

Japan would like to make a comment on the proposal of the Harmonized Passing Beam Headlamp (TRANS/WP.29/GRE/2004/6), as follows;

Under the proposal, there are the following 3 classes of passing beam headlamps;

Class A (incandescent bulb) headlamp

Class B (halogen bulb) headlamp

Class C harmonized headlamp

If this proposal is approved in GRE, the headlamp should be unified to the Class C "Harmonized Headlamp", and the current Class A and Class B should be no more used, from the point of view of an international harmonization. In order to do so, Japan would like to propose either of the followings;

A.1 PROPOSAL

ECE Regulation No. 48, paragraph 6.1., amend to read:

"6.1. Only Class C headlamp should be designated."

(In the same manner as the rear retro-reflector in paragraph 6.14.2. and 6.15.2. of ECE Regulation No. 48.)

or

A.2 PROPOSAL

ECE Regulation No. 112, paragraph 6.2.5.1., amend to read:

6.2.5.1. The following note is added in Paragraph 6.2.5.1;

Note: Class A and Class B headlamps are not permitted for the new vehicles other than slow-moving vehicles and motorcycles.

B. JUSTIFICATION

At the beginning of the discussion of the harmonized passing beam headlamp, there are the harmonized 4 common points, which have been originally researched by UMTRI. They have been agreed in one of the previous GRE session (TRANS/WP29/GRE/R.210/Rev.1/Add.1), as the most important points of the harmonized passing beam headlamp. Now, the proposed Class C headlamp is incorporating these harmonized 4 common points in TRANS/WP.29/GRE/2004/6.

Japan has already incorporated these 4 points into the Japanese regulation, so in these points the Japanese regulation is now different from the Class A and Class B headlamps in the current ECE Regulation No. 112, and that is why Japan cannot accept the current ECE Regulation No. 112 at present time.

Upon completion of either of the above proposed amendments, Japan strongly would like to accept the ECE Regulation No. 112 immediately.
