

NETHERLAND'S COMMENTS ON PROPOSALS FOR DRAFT AMENDMENTS TO
REGULATIONS Nos. 6 and 48

(Activation of a tell-tale in the event of malfunction of direction indicators)

Note: The text reproduced below was prepared by the expert from the Netherlands in order to comment on the joint proposals transmitted by the experts from GTB and OICA (ECE/TRANS/WP.29/GRE/2006/26 and ECE/TRANS/WP.29/GRE/2006/27), with regards to the conditions for the activation of a tell-tale, in the event of malfunction of direction indicators equipped with multiple light sources.

A. BACKGROUND

At the fifty-second (52nd) session of GRE, informal document No. GRE-52-23 was presented by the expert from the Netherlands. That informal document was prepared as a result of discussions in the Netherlands about the interpretation concerning the activation of the tell-tale of direction indicators. The question was raised when the tell-tale shall be activated, indicating the event of malfunction of a direction indicator equipped with multiple LED's (multiple light sources, more than two). The Netherlands asked for the opinions of other delegates on this issue, in particular of the experts from GTB.

During the fifty-third (53rd) session of GRE, the expert from GTB informed GRE that the work on this issue was still in progress within the GTB working group. However, already then GRE agreed on the urgency of this subject. The problematic nature of the issue was greater than initially anticipated, according to GTB.

Nevertheless, during the fifty-fourth (54th) session of GRE, the expert from GTB presented documents TRANS/WP.29/GRE/2005/8 and TRANS/WP.29/GRE/2005/9, proposing new provisions for the activation of the tell-tale for direction indicators equipped with multiple light sources. The expert from the Netherlands expressed his thanks for the thorough and arduous work done by GTB, facing this difficult task. The Netherlands were fully prepared to accept the proposals from the experts of GTB. However, during the same session, OICA presented their informal documents Nos. GRE-54-11 and GRE-54-12, through which they indicated their disagreement with the GTB proposals, by suggesting some amendments to those proposals.

As a result, during the fifty-fifth (55th) session of GRE, compromise proposals from OICA and GTB were presented as informal documents Nos. GRE-55-4 and GRE-55-5. The expert from the Netherlands, and other experts, expressed great concerns that the requirements proposed in both documents would not guarantee the necessary safety level.

Now, at the fifty-sixth (56th) session of GRE, the informal documents containing the compromise proposals from OICA and GTB in principle have, although slightly amended, become formal documents ECE/TRANS/WP.29/GRE/2006/26 and ECE/TRANS/WP.29/GRE/2006/27.

B. COMMENTS

The compromise proposal, which was made due to the intervention of OICA, suggests that only the minimum intensity required in the axis of reference needs to be met in order to consider that the direction indicator is still operating correctly. Such a condition is not acceptable. It is simply not good enough. Moreover, the direction indicators are required to have substantially large angles of geometric visibility. And this is, of course, not without a reason. Due to the nature of the intent of the signal, it is fully justified.

The Netherlands remain of the opinion that the compromise proposals still would not guarantee the necessary safety level. Particularly LED's are light sources with, often, very directional light output. This means that even if there is the minimum amount of light emitted along the axis of reference, there is no guarantee that there will be enough light, if any at all, within the remaining area delimited by the angles of geometric visibility.

In short, the Netherlands can not accept these compromise proposals.

Already during the 54th session of GRE, the expert from the Netherlands was able to accept the original proposals from GTB, also on the basis of the reporting by the expert working group of GTB. We believe that the initial outcome of the expert working group of GTB is, to date, the best one possible.

Therefore, we suggest that GRE should re-consider the contents of GTB's original proposals, contained in the documents TRANS/WP.29/GRE/2005/8 and TRANS/WP.29/GRE/2005/9.

The Netherlands can support these original proposals and hope to see adoption of them soon. This in order to, at long last, resolve this important issue, which has been dragged on now for too long.
