INDIA'S COMMENTS ON NEW PROPOSAL FOR ECE R 48 VIDE ECE/TRANS/WP.29/GRE/2009/3

India agrees for the amendments suggested by the expert from United Kingdom in order to permit optional additional side direction indicator lamps on long vehicles to improve the conspicuity of the drivers' signalling intention to vulnerable road users. However we suggest the following further modification to clause 6.5.3

Paragraph 6.5.3., amend to read:

"6.5.3. Arrangements (see figure below)
A: two front direction-indicator lamps of the following categories:

\[\text{\ldots}\]

5
for all M1 vehicles;
for N1, M2 and M3 vehicles not exceeding 6 metres in length.

A maximum of one additional optional Category 5 device per side on above vehicles.

6
for all N2 and N3 vehicles;
for N1, M2 and M3 vehicles exceeding 6 metres in length.

A maximum of one additional optional Category 6 device per side on above vehicles.

It is permitted to replace Category 5 side direction-indicator lamps by Category 6 side direction-indicator lamps in all instances

A maximum of three optional Category 5 or one optional Category 6 device per side on vehicles of type M2, M3, N2 and N3 exceeding 9 m in length.

Justification:

This proposal will allow a limited number of additional direction indicators to be fitted to the side of vehicles to supplement the mandatory category 5 or 6 device without distracting other road users.

Such provision would allow current practice by the industry to use side repeater on external rear view mirror in addition to the one normally provided on the fender.(Ref. photographs of typical vehicle)