Agenda item 4(c)

Regulation No. 48 (Installation of lighting and light – signalling devices)

Clarifications on installation requirements

Paragraph 6.21

CONSPICUITY MARKINGS

Basic document TRANS/WP.29/GRE/2009/69
Content

Objectives of this proposal

General Problems

Detailed Questions
The European Directive for the Whole Vehicle Type Approval (WVTA) is intended to extend the application to all categories of vehicles, and also to single vehicle approval.
That means:

All vehicles which were been excluded before or which are seen as matter for the national authorities, shall now meet all technical requirements as requested by the WVTA!
As from 10 July 2011,

EU Member States will issue certificates of conformity for new vehicles regarding lighting installation

only if the vehicle complies with Regulation No. 48

In addition, such requirements may also be introduced by other Contracting Parties.
To make it clear

The proposal of Germany do not tough vehicles which could at which the installation is possible without any problem or which could be constructed or designed in such a way that it makes no problem.

→ No carte blanche
The proposal appears not to such vehicles! …
The majority of the vehicles which are covered by paragraph 6.21 in R 48 have no problems to fulfil these requirements!
This proposal is intended to solve problems for vehicles for which it is impossible, due to the shape, structure, design or operational requirements, required or caused by the use and/or operational necessities!! of the vehicle, to comply with all or part of the requirements.
Similar situation …

under run protection!

e.g. Directive 2000/40/EC

1.3. The requirements of this Directive do not apply to:
1.3.1. off-road vehicles of categories N2 and N3;
1.3.2. vehicles such that their use is incompatible with the provisions of front under run protection.

Or

e.g. ECE-R 73

Paragraph 8 Derogations
Dispute between the question
“impossible” or “impractical”
And
“bad engineering”
Question

100 m
Conspicuity Marking is a device intended to increase the conspicuity of a Vehicle in a far distance of more than 100m.
Characteristic light distribution of a low beam lamp projected on a screen at 25 m with vertical cuts through the ECE measuring point B50L and E50L shown as E (50L) and the ECE measuring point 75R shown as E (75R) as defined e.g. in the ECE-Regulation 112.
Question

Mounting Height
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Upper mounting position
But better performance

Lower mounting position
But reduced performance

If possible,
other mounting positions must determined for the specific material by additional tests!
Question

Non flat surfaces
Non flat surfaces …

If possible, the mounting on a non flat surface must determined for the specific material by additional tests!
Simple demonstration ...

Non flat surfaces ...
Question

Flexible materials ↔ tarpaulins
Durability

Statement of materials manufacturer:

The **warranty** for materials on rigid parts is nearly three times longer than for materials on flexible surfaces!

Customs Requirements ....
But also some vehicles are completely covered by tarpaulins and curtains ...
Question

Difficult vehicles …
riffed metal sheets - required by Employer & Liability Insurance Associations
Question

Problems in practise ...
The rear part inclusive the rear under run protection device is completely in the mud! 
Retro-reflective marking material will be destroyed!
Question

High temperature …
Vehicles for the transport of substances with high temperature, e.g. bitumen
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Heater!
Range 100° to 300°
Question

Alternative retro-reflectors..
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Question

ECE – R 70 plates …
Alternative application of Regulation 70 plates
Alternative application of Regulation 70 plates
Following the contour ....
Possible conflicts with national requirements for municipal vehicles must be solved national!
Question

Load
Load!
Load!
This is load!
Problems with exchangeable container systems:
When the load is on the vehicle, the markings are mostly obscured!
Thank you very much
For
your attention and your patience