Horizontal Reference [ Regulation ]

63rd GRE

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30 March 2010
Challenge of collective amendments
(e.g. - 10 docs prohibiting use of light source module in cap-holder system for approved light sources, or 23 docs in item 5.c)

• Confusion & misinterpretation of provisions having the same intent
  – Different texts in individual device Regulations to express same idea caused by
    • time of Regulations’ development
    • numerous and chaotic amendments

• Introduction of a new concept fitting one device followed later by several amendments to “align” devices with previously agreed solution (e.g. “Y” lamps)
Solution – step one

• Create “Horizontal Reference [ Regulation ]”
  – Identify and consolidate all common provisions
    • Administrative
      – All Items related to type approval
      – Marking
      – [ Transitional Provisions for collective amendments ]
    • Technical
      – Definitions
      – Specifications
      – Test procedures
Solution – step two

• Amend individual device Regulations
  – Leave all paragraphs
    • Administrative / type approval
      – Refer to Horizontal Reference [ Regulation]
    • Technical
      – Refer to Horizontal Reference [ Regulation]
      – Maintain device unique provision
  – Do not change series of amendments
  – Change ‘Revision’ number
1. Scope
2. General definitions
3. Application for approval
4. Markings
5. Approval
6. General requirements
7. Intensity of light emitted
8. General test procedures
9. Colour definitions
10. Modifications ...& ext. of approval
11. Conformity of production
13. Production definitely discont.
14. Tech. serv. & admin. depts
15. [ Transitional Provisions ]

1. Scope
2. Ref. HR + unique definitions
3. Reference to HR
4. Ref. HR + unique markings
5. Reference to HR
6. Ref. HR + unique requirements
7. Ref. HR + unique photometry
8. Ref. HR + unique test procedures
9. Colour of emitted light + Ref HR
10. Reference to HR
11. Reference to HR
12. Reference to HR
13. Reference to HR
14. Reference to HR
15. Ref. HR + unique Trans. Prov
Minor collective amendment

• Horizontal Reference [ Regulation ]
  – Amend provisions (one precise change)
  – If necessary
    • Amend format / content requirements of general communication document
    • [ Amend Transitional Provisions ]

• Individual device Regulation
  – No amendment required
Major collective amendment

• Horizontal Reference [ Regulation ]
  – Amend technical provision (one precise change)
  – Amend general marking specification
  – Amend general communication document
    - format / content requirements / etc
  – [ Amend Transitional Provisions (if needed) ]
  – [ Change series of amendments ]
Major collective amendment

• Individual device Regulation
  – Change series of amendments
  – Amend unique device marking provisions
  – Amend specific Transitional Provisions (if needed)
  – [ Amend references to reflect new series of amendments of the Horizontal Regulation (one ‘replace’ action) ]
Legal consequences

• NO Type Approval to Horizontal Reference [ Regulation ]

• Individual device Regulation = status quo
  – Series of amendments
    • [ reflect change in series of amendments in references to Horizontal Regulation ]
  – Transitional Provisions
    • [ in addition to Horizontal Regulation ]
Benefits – CP & secretariat

• No patchwork of multiple amendments
  – Provisions change for all devices
    • Same way & Same time
  – Minimized chance for errors

• No surprises
  – Chance to evaluate new idea as it affects all involved devices

• Chance to improve and harmonize test procedures

• Chance to update obsolete provisions

• Reduced *paperwork* and administrative effort
Benefits – Test house

• Clear identification of core requirements
  – Administrative
    • type approval process
    • marking
  – Technical
    • test procedures
    • performance requirements
  – Opportunity for well defined (streamlined) in-house test procedure setup & chance to eliminate unnecessary tests

• Clear presentation of unique provisions
  – Opportunity to evaluate their need
Summary – Horizontal Ref. [Reg.]

• Establish Horizontal Reference [Regulation]
  – Consolidate common provisions
    • Harmonize individual Regulations
    • Improve administrative procedure
    • Update test procedures
    • Eliminate outdated performance requirements

• [ Make Horizontal Regulation a “legal” tool in jurisdiction of CPs applying individual Reg.
  – Attach HR as annex to the 58 Agreement or
  – Agree that all CPs apply the HR ]
Summary – Individual Regulation

- Amend individual device Regulations
  - Update vis-à-vis new technology & new needs
  - Identify device-specific performance needs
  - Revise and reduce device-specific performance requirements
  - Revise need for individual test demands
  - Revise and update Transitional Provisions