

## **Complaints about the intensity of (LED) Stop Lamps**

### **1. Introduction – How does the secretariat normally deals with inquiries**

1. The secretariat regularly receives questions, comments and requests by email or through the contact tool available on its web-page.
2. Most of the questions are related to the interpretation of the UN Regulations. In that case the secretariat provides answers and information but also always refers to the Type Approval Authorities, because only Contracting Parties are entitled to provide legal interpretation of the Agreement and its UN Regulations.
3. Some other emails received are sent by patent owners who would like to make their inventions mandatory through the UN Regulations. In that case the secretariat explains how WP.29 is working and proposes them to contact the experts from Governments or NGOs.
4. The secretariat receives in rare cases some complaints about provisions contained in UN Regulations. In that case the secretariat also explains how WP.29 is working and proposes the authors of the complaints to contact the experts from Governments or NGOs. The secretariat is rarely in the situation to have to inform WP.29 or its subsidiary bodies about these inquiries.

### **2. Complaints about (LED) stop lights intensity**

5. In that context, the secretariat has received several complaints about the intensity of (LED) stop lamps. Some examples of such complaints were reviewed by the GRE Chair and Vice-Chair. The complaints often describe the situation of a driver following a vehicle, whose driver often regulates its speed by applying the brakes and therefore often activates the stop lights. No one seems to dispute the need for a high intensity light-signal in case of an emergency. But the need for a high stop light intensity was questioned when the vehicles are in close proximity in situations such as "stop and go" or standstill at traffic lights. Discomfort and glare due to this intensity (increased by rainy weather) were mentioned.

### **3. Purpose of this document**

6. The purpose of this document is to inform GRE about these complaints, which do not seem to be isolated (though the secretariat did not make any statistic or technical assessment). The Chair and the Vice-Chair requested the secretariat to inform GRE about these complaints and to ask:
    - (a) Whether other experts (Governments, NGOs) have received such complaints;
    - (b) Whether the GRE experts would consider assessing the stop light intensity as a potential issue;
    - (c) Whether the industry would consider or is already addressing intensity levels of signalling and marking devices in situations such as vehicles in "stop and go" or vehicles waiting at traffic lights.
    - (d) Whether the performance requirements concerning the intensity of the stop lamps are satisfactory or should be replaced, e.g. by luminance performance requirements.
-