Proposal for a supplement to the 04 series of amendments to Regulation No. 46 (Devices for indirect vision)

The text reproduced below was prepared to introduce an amendment to the 04 series of amendments concerning a conflicting requirement for the functioning of camera-monitor systems.

I. Proposal

Paragraph 6.2.1.2., amend to read:

"6.2.1.2. If a device for indirect vision can only render the total prescribed field of vision by scanning the field of vision, the total process of scanning, rendering and reset to its initial position together shall not take more than 2 200 milliseconds at room temperature of 22 °C ±5 °C."

II. Justification

Paragraph 6.2.1.2. reads: "If a device for indirect vision can only render the total prescribed field of vision by scanning the field of vision, the total process of scanning, rendering and reset to its initial position together shall not take more than 2 seconds."

With supplement 2 to the 04 series of amendment camera-monitorsystems were introduced as devices for indirect vision that can replace mirrors of classes I to IV. The requirement for the delay time to display the field of view is given in paragraph 6.2.2.3.4.3 which reads:

"6.2.2.3.4.3. System latency

A CMS shall have a sufficient short latency to render the scenery nearly at the same time. The latency shall be lower than 200 ms at room temperature 22 $^{\circ}$ C ± 5 $^{\circ}$ C."

Both provisions are in contradiction to each other. A value of 2 seconds is not reflecting state of the art of this technology anymore and even more important, it is not providing the safety level necessary. It is therefore proposed to change the latency to 200 ms as provided for camera-monitor-systems in supplement 2 to the 04 series of amendments.