OICA Comments to GRE/2017/17 and GRE/2017/22
Installation Approval based on ECE R48, 03, 04, 05, 06 series (GRE-2017-22)

Lamp Approval based on LSD

LED Substitute Approval based on ECE R128 & R.E.5

Theory
1st Example

Installation Approval based on ECE R48, 03, 04, 05, 06 series (GRE-2017-22)

LED Substitute Approval based on ECE R128 & R.E.5

Lamp Approval based on LSD

LED Substitute Approval based on ECE R128 & R.E.5

Lamp Approval based on LSD

Installation Approval based on ECE R48-06
Installation Approval based on ECE R48, 03, 04, 05, 06 series (GRE-2017-22)

LSD is only introduced for ECE R48-04/05/06 (GRE/2017/11 / GRE-78-14/GRE-78-15)

LED Substitute Approval based on ECE R128 & R.E.5

Lamp Approval based on LSD

2nd Example

LED Substitute Approval based on ECE R128 & R.E.5

Lamp Approval based on LSD

Installation Approval based on ECE R48, 03, 04, 05, 06 series (GRE-2017-22)
Where a vehicle manufacturer sees potential problems with installing LED substitutes on a previously approved UN R48/03 or 48/04 vehicle type an extension of the approval maybe necessary in order to prevent the vehicle manufacturer being held accountable for misuse.

That would be an unacceptable burden for the vehicle manufacturer!