Proposal for amendments to ECE/TRANS/WP.29/GRE/2019/28

The text reproduced below was prepared by the expert from the European Association of Automotive Suppliers (CLEPA) to further improve the proposal submitted by the experts from France and Germany to allow under specified conditions the use of manufacturer logos inside the illuminant surface of a signalling lamp. The modifications to the existing text of ECE/TRANS/WP.29/GRE/2019/28 are marked in blue bold for new and strikethrough for deleted characters.

I. Proposal

A. Proposal for a Supplement to UN Regulation No. [148]

Amend paragraph 4.5.6. to read:

"4.5.6. On request of the applicant, the internal structure of the optical components and/or the texture of the outer lens inside of the apparent surface of a lamp (function) may incorporate a manufacturer logo build by transparent or non transparent components provided that all requirements for the specific function of this Regulation are fulfilled and in addition the following conditions:

(a) Irrespective of the Marking Requirements in paragraph 3.3., only the logo of the brand name of the vehicle manufacturer or the body manufacturer or lamp manufacturer is allowed. This shall be confirmed by the applicant by a statement (see paragraph 3.1.2.2. (e)).

(b) Size: the enclosed light-emitting surface of the logo (incorporating transparent or non transparent components of the logo) of such a lamp in the direction of the reference axis shall not exceed 100 cm².

(c) Symmetry: notwithstanding the requirements of paragraph 5.5.2. of UN Regulation No. 48, the logo light emitting surface does not have to be symmetrical by itself.

(d) Stop lamps shall not incorporate a logo.

(e) A lamp in a shape of a band shall not incorporate a logo."
B. Proposal for a Supplement to the 06 series of amendments to UN Regulation No. 48

Amend paragraph 5.5.5. to read:

"5.5.5. In case of lamps incorporating a manufacturer logo, only not more than two can be fitted on the rear of the vehicle and/or not more than two on the front, one on each side or one centered on the median plan of the vehicle.

II. Justification

1. In the recent years, some lamps have been approved with apparent surfaces that could have evocative/suggestive/figurative shape. At the seventy-eighth session of GRE, the experts from France and Germany raised questions on this issue (GRE-78-03). Following the discussion, a questionnaire was prepared and sent to all Contracting Parties. The results were presented at the eightieth session of GRE (GRE 80-28). A formal proposal (ECE/TRANS/WP.29/GRE/2019/6) was submitted by the experts from France and Germany at the eighty-first session of GRE. GRE noted that a clear definition of the logo would be needed. This revised proposal is in accordance with the comments received at that GRE session.

2. The following principles were discussed with the aim to create a simple compromise solution for allowed logos:

- The definition of a manufacturer logo is added.
- Only the logo of the vehicle manufacturer (included the manufacturer in a multistage vehicle type approval) is allowed. Logos of equipment suppliers are not allowed.
- Logo shall be type-approved as being part of a current existing signalling function (i.e. front position lamp, rear position lamp).
- Location of logo: at the front or at the rear of vehicle.
- Number of logos:
  - not more than two logos at the rear with only one on each side, and/or two logos at the front with only one on each side;
  - no central logo considering unexpected distractions lighting issues.
- Size: maximum light-emitting surface of logo: less than 100 cm², so that to avoid being considered as lighting advertisement (considering the current existing national laws).
Symmetry: the logo light emitting surface does not have to be symmetrical by itself, considering that the maximum size is smaller than 100 cm².

3. The "Logo"-specifications made in the proposal should reduce intentional and increased attention of other road users to an acceptable level. Their distraction should be avoided as much as possible. This is the reason why the stop lamps should not incorporate a logo, even for S1/S2 lamps, for evident safety reasons (no distraction).

4. Based on the outcome of previous discussions, revised draft amendments to UN Regulations Nos. [148] and 48 are now presented in this proposal.