

### Japan's concerns about the scope of the R48

Japan is aware of the following issues.

We are considering proposing amendments to R48 in the future, but before doing that, we would like to hear your opinions

- The paragraph 5.1. of R48 states that “The lighting and light-signalling devices shall be so fitted that under normal conditions of use as defined in paragraphs 2.3.10., 2.3.10.1. and 2.3.10.2. and ...”. This means that the technical requirements of R48 are imposed under "normal conditions of use".
- In Japan, even before the application of R48, the same regulations have been applied to maintain traffic safety regardless of whether the vehicle's engine is running or not.
- If the lights are turned on when parked on the street, they can be distracting and disorienting to other traffic. Therefore, we believe that regulations against engine stop conditions are also very important.
- R48 also has a technical requirement for an exterior courtesy lamp, which also regulates the engine stopped condition. This indicates that the R48 is no longer limited to regulating only the "normal condition of use".
- For example, prohibiting activating the main-beam HL, DRL, and reversing lamps as an exterior courtesy lamp is appropriate from the perspective of preventing distraction to other traffic.
- Similarly, we believe that other lights should be regulated in terms of how they are turned on under engine stopped condition.
- International law should be as stringent as possible, since devices approved by the Regulation are obliged to be accepted. If you think that it is not necessary to regulate the engine stopped condition, the regulations can be relaxed in the respective national laws.
- To expand the scope of R48, we propose that we should amend the paragraph 5.1. of R48 as follows:

*Paragraph 5.1., amend to read:*

- 5.1. The lighting and light-signalling devices shall be so fitted that under normal conditions of use **and parking conditions** as defined in paragraphs 2.3.10., 2.3.10.1., 2.3.10.2. **and 2.3.11.** and notwithstanding any vibrations to which they may be subjected, they retain the characteristics prescribed by this Regulation and enable the vehicle to comply with the requirements of this Regulation. In particular, it shall not be possible for the lamps to be inadvertently maladjusted.