

Question to SLR (communication)

Issued and finished during 1st stage of SLR progress (current text of Regulation).

ECE R.148:

3.2. Approval

*3.2.1. A **separate approval is required for each lamp listed in paragraph 1.***

3.2.3.2. An approval number shall be assigned to each type of lamp approved and shall be indicated for each lamp in the communication form in Annex 1.

A contracting party may assign the same approval number to light-signalling devices or systems incorporating a number of lamps but shall not assign the same number to another type of lamp of the same function.

1958 Agreement, Schedule 4 - Numbering of UN type approvals:

4. The same Contracting Party shall not assign the same number to another approval.

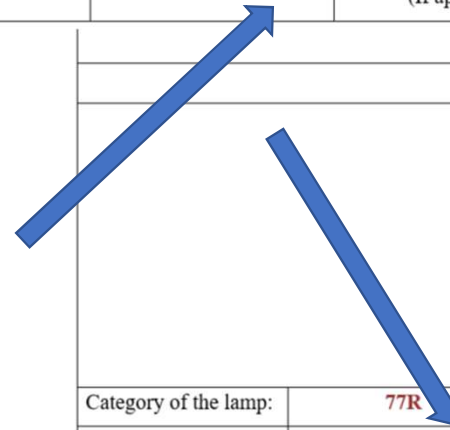
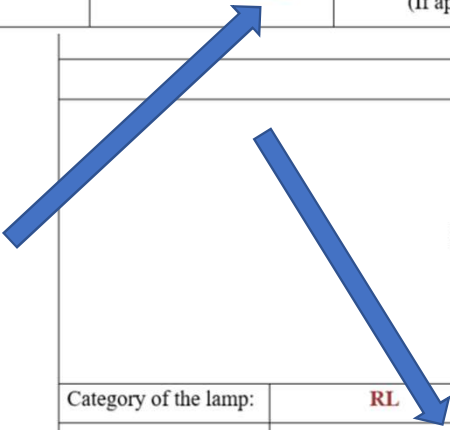
Rear examples - Authority A - one number, several communication forms (approvals)

Communication - real example No. 1a

Ex	issued by:	Name of Administration: Authority A		
	Concerning: ²	Approval granted Approval extended Approval refused Approval withdrawn Production definitively discontinued		
of a type of lamp pursuant to UN Regulation No. 148				
Lamp: ⁴	Rear-registration plate illuminating lamp Direction indicator lamp Stop-lamp Position lamp End-outline marker lamp Reversing lamp Manoeuvring lamp Rear fog-lamp Parking lamp Daytime running lamp Side marker lamp			
Category of the lamp:	1a	Change index:	n/a	
Approval No:	Ex*148R00/00* 00002 *00	Unique Identifier (UI) (If applicable)	n/a	
Production definitively discontinued				
of a type of lamp pursuant to UN Regulation No. 148				
Lamp: ⁸	Rear-registration plate illuminating lamp Direction indicator lamp Stop-lamp Position lamp End-outline marker lamp Reversing lamp Manoeuvring lamp Rear fog-lamp Parking lamp Daytime running lamp Side marker lamp			
Category of the lamp:	RL	Change index:	n/a	
Approval No:	Ex*148R00/00* 00002 *00	Unique Identifier (UI) (If applicable)	n/a	


Communication - real example No. 1b

Ex	issued by:	Name of Administration: Authority A		
	Concerning: ²	Approval granted Approval extended Approval refused Approval withdrawn Production definitively discontinued		
of a type of lamp pursuant to UN Regulation No. 148				
Lamp: ⁶	Rear-registration plate illuminating lamp Direction indicator lamp Stop-lamp Position lamp End-outline marker lamp Reversing lamp Manoeuvring lamp Rear fog-lamp Parking lamp Daytime running lamp Side marker lamp			
Category of the lamp:	A	Change index:	n/a	
Approval No:	Ex*148R00/00* 00002 *00	Unique Identifier (UI) (If applicable)	n/a	
Production definitively discontinued				
of a type of lamp pursuant to UN Regulation No. 148				
Lamp: ⁸	Rear-registration plate illuminating lamp Direction indicator lamp Stop-lamp Position lamp End-outline marker lamp Reversing lamp Manoeuvring lamp Rear fog-lamp Parking lamp Parking lamp Daytime running lamp Side marker lamp			
Category of the lamp:	77R	Change index:	n/a	
Approval No:	Ex*148R00/00* 00002 *00	Unique Identifier (UI) (If applicable)	n/a	



Rear examples - **Authority B** - one number, one communication form (approvals)

Communication - real example No. 2

	issued by:	Name of Administration: Authority B	
	Concerning: ²	Approval granted Approval extended Approval refused Approval withdrawn Production definitively discontinued	
of a type of lamp pursuant to UN Regulation No. 148			
Lamp: ²	Rear-registration plate illuminating lamp		
	Direction indicator lamp ← Stop lamp Position lamp ← End-outline marker lamp Reversing lamp Manoeuvring lamp Rear fog lamp Parking lamp ← Daytime running lamp ← Side marker lamp		
Category of the lamp:	1a, A, 77R, RL	Change index:	n/a
Approval No:	Ex*148R00/00*00001*00	Unique Identifier (UI) (If applicable)	n/a

Question to SLR (communication)

ECE R.148:

3.2. Approval

3.2.1. *A separate approval is required for each lamp listed in paragraph 1.*

- **Is the communication form issued by Authority B correct?**

3.2.3.2. *An approval number shall be assigned to each type of lamp approved and shall be indicated for each lamp in the communication form in Annex 1.*

A contracting party may assign the same approval number to light-signalling devices or systems incorporating a number of lamps but shall not assign the same number to another type of lamp of the same function.

But it seems it is in direct contradiction of 1958 Agreement, Schedule 4 - Numbering of UN type approvals:

4. The same Contracting Party shall not assign the same number to another approval.

- **Is the communication form issued by Authority A correct?**

- **Or current text does not allow one approval No. for different categories in grouped lamps?**

In my understanding only legal possibility is to have different approval number for each function (for approval according to all new lighting device regulations), but it would be a contradiction with simplification and very problematic for producers of the lamps. I really hope I am wrong.

We have not to forget for **Regulations R.149 and 150** (slightly different situation, but maybe should be discussed as well).