

GTB - Davide PUGLISI

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Cc: Fabian Stahl (fabian.stahl@de.tuv.com)
Oggetto: UNECE-R149 - missing provision on voltage marking

Dear SLR colleagues,

we were receiving a hint from TÜV Rheinland Lichttechnik GmbH (Fabian Stahl) with regard to a possibly missing provision on the voltage marking in Regulation 149 (both 00 series and 01-proposal):

All old headlamp and fog lamp regulations (R19, R98, R112, R113 and R123) contain the following provision (in paragraph 3.4. respectively 3.6.) for lamps with LED modules (no matter if these modules are **replaceable or not**):
“In the case of lamps with LED module(s), the lamp shall bear the marking of the rated voltage and rated wattage and the light source module specific identification code.”

In regulation 149-00 this marking is just required for lamps with **replaceable** LED modules:

“3.3.2.6.2. In the case of lamps with replaceable light source(s) or with replaceable light source modules, a marking indicating:

- (a) The category or categories of light source(s) prescribed for headlamps of Classes AS, BS, CS, DS, ES and cornering lamps; and/or
- (b) The light source module specific identification code; and /or
- (c) The rated voltage(s), the rated wattage(s) and specific identification code of LED module(s) for headlamps, front fog lamps and AFS;”

According to my memory in SLR we agreed that “the light source module identification code” marking is just needed in case of replaceable modules – accordingly this is ok.

But what about the voltage and wattage marking? Today`s text in R149 does not require a voltage or wattage marking on headlamps, AFS and/or front fog lamps equipped with **non-replaceable** light sources or light source modules. To my understanding it would be worth to discuss this topic during our next SLR meeting.

Thank you – and best regards,
Gert

Best regards | Mit freundlichen Grüßen

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