**Von:** Schaefer, Theodor (I/ER-5)   
**Gesendet:** Donnerstag, 12. August 2021 11:47  
**An:** Jean-Marc Prigent <[jmprigent@oica.net](mailto:jmprigent@oica.net)>  
**Cc:** Stephan Berlitz (I/EE-13) ([stephan.berlitz@audi.de](mailto:stephan.berlitz@audi.de)) <[stephan.berlitz@audi.de](mailto:stephan.berlitz@audi.de)>; Torsten Schwarz (I/ET-B2) ([Torsten.Schwarz@AUDI.DE](mailto:Torsten.Schwarz@AUDI.DE)) <[Torsten.Schwarz@AUDI.DE](mailto:Torsten.Schwarz@AUDI.DE)>  
**Betreff:** SIG on R48-09 - 1st session: Outcome and Action-items

Dear Jean-Marc,

thank you for your e-mail.

We from Audi side are concerned about the discussion regarding restrictions for the parking situation started by Japan. We fear that this discussion will lead to a general ban to use lamps in parking conditions what would not be justified.

There are many use cases where it makes sense that vehicles provide some light for the passengers getting in / out of the vehicle or to warn the surrounding traffic about a vehicle door which is intended to be opened by a passenger. Beyond that there is various communication between the vehicle and the driver and there is need for function check by the driver and for repair purpose.

So, if a discussion about the use of lamps under parking conditions is to be started, all possible use cases would have to be considered and not only animations.

In our eyes these matters are to be regulated by national conduct law (for example the “road traffic regulations” in Germany).

§1 of the German conduct law stipulates:

“(1) Participation in road traffic requires constant caution and mutual consideration. (2) Anyone who takes part in traffic must behave in such a way that no one else is harmed, endangered or more than unavoidable under the circumstances, hindered or annoyed.”

As a result animations like Tesla`s easter egg would not be allowed in Germany in the public if it disturbs the traffic (but would be possible on private property).

Basically the contracting parties would exceed their competencies by regulating something what is already regulated sufficiently by conduct law. The UN ECE R48 is primarily made for in use rules for mounting and photometric performances.

If nevertheless a regulation should be deemed necessary, please find attached the proposal for the Japanese proposal for a series of amendments with some remarks (See SIG-02-07).

Please let us know if we can support with additional information.

Best regards

Theodor Schäfer

Mit freundlichen Grüßen   
**Theodor Schäfer**  
Entwicklung Licht / Sicht

AUDI AG, I/ER-5  
D-85045 Ingolstadt