

## K.Fujimoto

---

差出人: Burkhard.Boettcher@tzll.adac.de  
送信日時: 2022年1月4日火曜日 1:18  
宛先: K.Fujimoto  
C C: jmprigent@oica.net  
件名: GRE - SIG on R.48-09 - 3rd session  
  
重要度: 高

Dear Mr. Fujimoto,  
thank you very much for your efforts and investigations for the SIG. Unfortunately, I could not take part on the 2<sup>nd</sup> session.

ADAC is talking for FIA as consumer protecting party and took part at the TF S/R of GRE.

I want to give some comments onto the document "SIG-02-06Rev01e (JP) answer to overview table", unless I understood to respond directly to you for preparing the 4<sup>th</sup> session this month:

Requirements for light animations  
from the point of view of road safety

1. No irritation of road users
  - a. No warning functions (f.e. blinking, flashing)
  - b. No sudden events (f.e. abrupt flashing or lighting up)
  - c. No light images that could represent a unparking process (f.e. direction indicator, low beam, position lights)
  - d. No glare, even if vehicle was parked against the direction of travel (f.e. asymmetric low beam full power)
  - e. No light images that occur when the vehicle is in motion (daytime running lights, marker lights, low beam)
  
2. No danger to road users
  - a. No distraction from road traffic (f.e. scaring/shocking, deducting attention even for vulnerable road users)
  - b. No eye glare to children and pets (risk of injury in the near field: low beam, high beam full power, high light density/intensity)

So, in total it means, that only slow light effects with low flux should be permitted.

Thank you for your attention.

With best regards,

**Burkhard Boettcher**  
Specialist Automotive Technology

## ADAC Test and Technology

ADAC e.V., Technik Zentrum, Otto-Lilienthal-Str. 2, 86899 Landsberg am Lech, Germany

T +49 8191 93 86 75

[burkhard.boettcher@adac.de](mailto:burkhard.boettcher@adac.de)

[www.adac.de](http://www.adac.de)

*Please consider the environment before printing this e-mail.*

This e-mail may contain confidential and/or proprietary information. If you are not the intended recipient (or have received this e-mail in error), please notify the sender immediately and destroy this e-mail and any attachment from your system. Any unauthorised copying, disclosure or distribution of the material in this e-mail is strictly forbidden.