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World Forum for Harmonization of Vehicle Regulations

Working Party on Lighting and Light-Signalling

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Item 6 (a) of the provisional agenda
Installation UN Regulations:

UN Regulation No. 48 (Installation of lighting and light-signalling devices)

Proposal for a new series of amendments to UN Regulation No. 48

Submitted by the expert from the Special Interest Group on the 09 series of amendments to UN Regulation No. 48*

The text reproduced below was prepared by the expert from Special Interest Group (SIG) on the 09 series of amendments to UN Regulation No. 48 with the aim to add the park condition of a vehicle in the scope of UN Regulation No. 48 and to minimise hazards, such as glare and distraction, to other road users. The proposed modifications to the current text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

^{*} In accordance with the programme of work of the Inland Transport Committee for 2022 as outlined in proposed programme budget for 2022 (A/76/6 (Sect.20), para 20.76), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Paragraph 2.4.1., amend to read:

"2.4.1. ["Equivalent lamps and lamps authorized according to national legislation"]

2.4.1.1. "Equivalent lamps" means lamps having the same function and authorized in the country in which the vehicle is registered; such lamps may have different characteristics from those installed on the vehicle when it is approved on condition that they satisfy the requirements of this Regulation.

[2.4.1.2. "Lamps authorized according to national legislation" means lamps differing from those covered by this UN Regulation authorized by the Contracting Party in which the vehicle is registered.

Paragraph 2.5.18., amend to read:

"2.5.18. "Exterior courtesy lamp" means a lamp used to provide supplementary illumination to assist the entry and exit of the vehicle driver and passenger or in loading operations; vehicle user to identify, approach or depart; enter or exit; load or unload the vehicle."

Paragraph 2.5.20., amend to read:

"2.5.20. "External status indicator" means an optical signal mounted on the outside of the vehicle to indicate the status or the change of the status for Vehicle Alarm System (VAS), Alarm System (AS) and immobilizer of UN Regulations Nos. 97, and 116, 162 and 163, when the vehicle is parked."

Insert a new paragraph 2.5.21. to read:

"2.5.21. "Energy indicator-lamp" means a lamp and/or a signal used to inform the vehicle user about the energy level, and/or the condition of the energy transfer system and/or the status of energy transfer of the vehicle."

Insert a new paragraph 2.6.4. to read:

"2.6.4. "Answer-back signal" means a signal used to assist the vehicle user to identify and find his/her car under the park condition of a vehicle."

Insert a new paragraph 2.7.10. to read:

"2.7.10. "Lamp test mode" means a system or mode which enables the vehicle user to perform a function check of the vehicle's lighting and light signalling devices and their associated systems."

Paragraph 3.2.2., amend to read:

"[3.2.2. A list of the devices prescribed by the manufacturer for the lighting and light-signaling assembly. The list may include several types of device for each operation. Each type shall be duly identified (component, type-approval mark, name of manufacturer, etc.); in addition the list may include in respect of each function the additional annotation "or equivalent devices"; in addition the list may include "lamps authorized according to national legislation";]"

Insert a new paragraph 3.2.10., to read:

"3.2.10. Where the vehicle is equipped with lamps that are used under the park condition as specified in 5.36., except for subparagraph (a) in 5.36.:

3.2.10.1. A list of the lamps used.

3.2.10.2. A detailed description providing the following information:

- the conditions for the lamps to be switched ON and OFF;
- if the lamps are flashing: the flashing frequency;

コメントの追加 [MG1]: Lamps authorized according to National Legislation are not a problem today because most of them operate in the parked condition. OICA needs this requirement in order to meet part of the CoP checks. The national authority can verify this against the lamps listed in the comm. form.

コメントの追加 [K2R1]: JP_1207: First, it is operationally problematic as there is no way to check whether each TS is a lamp approved under national law.
Furthermore, it is not a requirement that should be included in the

Furthermore, it is not a requirement that should be included in the UN Regulation, as the EC clearly expressed clear concerns about this provision at the 87th GRE session.

If there are lamps/functions to be added in under park condition, then provisions need to be set one by one, such as lamps of normal condition of use of the vehicle.

コメントの追加 [K3]: Response to France's request for ECL and answer-back signals to be differentiated.

コメントの追加 [MG4R3]: OK

コメントの追加 [K5]: JP_1207:The yellow hatched Energy indicator section needs to be reconsidered in its entirety, see comments in paragraph 6.28.

Note that "Energy indicator lamp" has been amended to "Energy indicator" to reflect the 30 November OICA proposal.

コメントの追加 **[K6]:** Response to France's request for ECL and answer-back signals to be differentiated.

コメントの追加 [MG7R6]: OK

 if the lamps are varying their intensity and/or apparent surface: the luminous intensity range and/or the changes in apparent surface.

This information may be provided by the vehicle manufacturer by sufficient documentation ([for example,] including line graphs clearly showing flash and/or vary in luminous intensity and/or apparent surface of the underlying regulations) or by other means accepted by the Type Approval Authority."

Paragraph 5.9., amend to read:

- "5.9. In the absence of specific instructions, the photometric characteristics (e.g. intensity, colour, apparent surface, etc.) of a lamp shall not be intentionally varied during the period when the lamp is switched ON.
- 5.9.1. Direction-indicator lamps, the vehicle-hazard warning signal, amber side-marker lamps complying with paragraph 6.18.7. below, the emergency stop signal shall be flashing lamps.
- 5.9.2. The photometric characteristics of any lamp may vary:
 - (a) In relation to the ambient light;
 - (b) As a consequence of other lamps being switched ON or OFF; or
 - (c) When the lamps is being used to provide another lighting function; provided that any variation in the photometric characteristics is in compliance with the technical provisions for the lamp concerned.
- 5.9.3. The photometric characteristics of a direction indicator lamp of categories 1, 1a, 1b, 2a or 2b may be varied during a flash by sequential activation of light sources as specified in paragraph 5.6. of UN Regulation No. 6. or paragraph 5.6.11. of UN Regulation No. 148.

This provision shall not apply when direction indicator lamps of categories 2a and 2b are operated as emergency stop signal according to paragraph 6.23.1. of this Regulation.

5.9.4. [Under the park condition,] the functions used as described in paragraphs

2.5.21. "Energy indicator-signal", 2.6.4. "Answer-back signal", 2.7.10.

"Lamp test mode" | and 2.5.18. "Exterior courtesy lamp" | may flash and/or vary in luminous intensity and/or apparent surface.

These lamps shall operate according to the conditions specified in general specifications and/or in dedicated paragraphs [6.24.,] 6.27., 6.28. and 6.29."

Paragraph 5.11.1., amend to read:

- "5.11.1. This requirement does not apply while one or more of the following conditions exist:
 - (a) Front and rear position lamps, as well as side-marker lamps when combined or reciprocally incorporated with said lamps are switched ON as parking lamps;
 - (b) Side-marker lamps flash in conjunction with direction indicators;
 - (c) Daytime running lamps are switched ON;
 - (d) Front position lamps function is substituted under the provisions of paragraph 5.12.1. below.
 - [(e) Lamps are operating under the provisions of paragraphs [6.24.,] 6.27., 6.28. and 6.29."

Paragraph 5.15., amend to read:

"5.15. The colours of the light emitted by the lamps⁷ are the following:

...

コメントの追加 [MG8]: Could Japan accept varying illumination of ECL lamps if we only use lamps that are invisible to other road users?

コメントの追加 [K9R8]: JP_1207: Acceptable if ECLs that follow and illuminate vehicle users can stipulate that they are not visible to other road users.

Manoeuvring lamp:

White

Energy indicator lamp:

White; however, other colours may be used if they follow the principles for colours specified in paragraph 5. of ISO 2575:2021-however,

Lif approved lamps are used as energy indicator lamps, the colour of the light emitted shall be the one specified for the corresponding lamp."

Insert a new paragraph 5.36, to read:

"5.36. Lamps that may be switched ON under the park condition of a vehicle are as follows:

- (a) Lamps in this UN Regulation as long as they are operated in the same manner as under the normal condition of use of a vehicle;
- (b) Lamps as defined in paragraph 2.5.13. "Parking lamps";
- (c) Lamps as defined in paragraph 2.5.18. "Exterior courtesy lamps";
- (d) Lamps as defined in paragraph 2.5.20. "External status indicator";
- (e) Light function as defined in paragraph 2.5.21. "Energy indicator lamp";
- (f) Light function as defined in paragraph 2.6.4. "Answer-back signal";
- (g) Light function as defined in paragraph 2.7.10. "Lamp test mode";
- (h) Lamps that the applicant can prove that the luminous intensity is less than [0.5] cd per lamp."

Insert a new paragraph 5.37. to read:

"[5.37. Lamps according to national legislation may have different characteristics from those installed on the vehicle when it is approved on condition that they are mounted and have characteristics as defined by the Contracting Party in which the vehicles are registered.]"

Paragraphs 6.24. to 6.24.3., amend to read:

"6.24. Exterior courtesy lamp

6.24.1. Presence

Optional on motor vehicles

6.24.2. Number

Two, however further exterior courtesy lamps to illuminate steps and/or door handles [, the area around the vehicle and to identify the vehicle] are permitted. Each door handle or step shall be illuminated by not more than one lamp.

6.24.3. Arrangement

No special requirement, however, the requirements of paragraph $6.24.9\, |3|$ apply."

Paragraph 6.24.9., amend to read:

"6.24.9. Other requirements

6.24.9.1. The exterior courtesy lamp shall not be switched ON unless the vehicle is stationary and one or more of the following conditions is satisfied:

- (a) The propulsion system is stopped; or
- (b) A driver or passenger door is opened; or

コメントの追加 [K10]: The removal of this clause on colour was agreed at an off-site meeting between Japan and OICA at the 87th GRF

コメントの追加 [MG11]: We understand that the reference to ISO is confusing. OICA to provide a list of the colours in 5.15. Their use should be defined in paragraph 6.

コメントの追加 [K12R11]: JP_1207:An alternative to 5.15. needs to be presented by the December SIG for the April agreement. If not possible, this should be considered in STEP 2.

コメントの追加 [MG13]: The applicant must prove this in any case therefore the wording is redundant.

コメントの追加 [K14R13]: JP_1206:OK

**Justification of (h): Given the definition and function of the EC

コメントの追加 [MG15]: The addition of (h) only permits the switching on of a lamp. We may need to permit the installation of such a lamp. OICA seek the interpretation of all CPs?

コメントの追加 **[K16R15]:** JP_1207:A new field is to be added to the communication form to include the lamp in (h) to address OICA's concerns.

コメントの追加 [MG17]: We believe original paragraph reference is OK.

コメントの追加 [K18R17]: JP_1206:OK

(c) A load compartment door is opened.

[The provisions of paragraph 5.10. shall be met in all fixed positions of use.]

- [6.24.9.1.1. The exterior courtesy lamps may be switched ON manually or automatically.]
- 6.24.9.1.2. The exterior courtesy lamps shall not flash and/or vary in luminous intensity and/or apparent surface.

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- [6.24.9.1.3. At the discretion of the manufacturer the combination of exterior courtesy lamps may be grouped in different patterns to suit the circumstances of their use and the environment
- 6.24.9.1.4. The photometric characteristics of the exterior courtesy lamps may vary in relation to the position of vehicle users. No sharp variation of intensity shall be observed during transition.]
- 6.24.9.2. The rear position lamps, the parking lamps, the side marker lamps, the end-outline marker lamps, and Aapproved the UN Regulation emitting white light with the exception of main beam head lamps, daytime running lamps and reversing lamps may be switched ON as courtesy lamp function. They may also be switched ON together with the exterior courtesy lamps and the condition of paragraph 5.11. and 5.12. above may not apply.
- 6.24.9.3 The technical service shall, to the satisfaction of the Type Approval Authority, perform a visual test to verify that there is no direct visibility of the apparent surface of the exterior courtesy lamps, if viewed by an observer moving on the boundary of a zone on a transverse plane 10 m from the front of the vehicle, a transverse plane 10 m from the rear of the vehicle, and two longitudinal planes 10 m from each side of the vehicle; these four planes to extend from 1 m to 3 m above and perpendicular to the ground as shown in Annex 14.

[At the request of the applicant and with the consent of the Technical Service this requirement the requirements of this paragraph may be verified by a drawing or simulation or deemed be satisfied if the applicant can prove that the luminous intensity is less than [0.5] ed per lamp taking into account the influence of the vehicle body if applicable]"

Insert a new paragraph 6.27., to read:

"6.27. Answer-back signal

6.27.1. Presence

Optional

6.27.2. Number

In accordance with the individual specifications applicable to the specific lamp used for the answer-back signal. However, it may be less than or equal to the individual specifications applicable to the specific lamp.

6.27.3. Arrangement

In accordance with the individual specifications applicable to the specific lamp used for the answer-back signal. However, it may be less than or equal to the individual specifications applicable to the specific lamp.

6.27.4. Position

6.27.4.1. In width: In accordance with the individual specifications applicable to the specific lamp used for the answer-back signal. However, it may be less than or equal to the individual specifications applicable to the specific lamp. コメントの追加 [K19]: Japan's position is not to allow driverfollowing lights by ECL in Step 1. Therefore, this clause is added.

コメントの追加 [MG20R19]: Please could you explain your justification for not allowing driver-following lights by ECL in step

コメントの追加 [MG21R19]: Japan>> Reason for not accepting: The function concerned does not specify how far or in which direction the driver may be illuminated, and there is also concern that the ECL may unintentionally illuminate in response to pedestrians or other persons around the vehicle.

コメントの追加 [K22R19]: JP_1207:Acceptable if ECLs that follow and illuminate vehicle users can stipulate that they are not visible to other road users.

コメントの追加 [MG23]: The added text is a change to text already existing in UN R48. Using the term 'lighting' would exclude the front position lamp and licence plate lamps for example.

コメントの追加 [K24R23]: JP_12-6:No problem.

コメントの追加 [MG25]: The added text is a change to text already existing in UN R48. We are unsure of the improvement her

コメントの追加 [MG26R25]: Japan>> We couldn't find the existing text in UN R48, so please tell me where you are referring to OICA text deleted as the lamps are not in line with the ECL definition for assisting the entry and exit of the vehicle driver and passenger or in loading operations (as it is below 0.5 cd). On the other hand, lamps below 0.5 cd should be allowed under 5.36(h) as under park condition lamps, so there should be no obstacle for manufacturer.

コメントの追加 [MG27R25]: Adding 5.36 (h) is OK for OICA in principle as alternative to the proposed industry text

コメントの追加 [K28]: Justification: Given the definition and function of the ECL, there is no need for it to be part of the ECL. Therefore, this requirement is moved to (h), 5.36.

コメントの追加 [**K29R28**]: OICA accept JP proposal with Nov

6.27.4.2. In height: in accordance with the individual specifications applicable to the specific lamp used for the answer-back signal.

However, if the height changes depending on the operating conditions of the propulsion system, it shall be less than or equal to the individual specifications applicable to the specific lamp.

- 6.27.4.3. In length: In accordance with the individual specifications applicable to the specific lamp used for the answer-back signal. However, it may be less than or equal to the individual specifications applicable to the specific lamp.
- 6.27.5. Geometric visibility

In accordance with the individual specifications applicable to the specific lamp used for the answer-back signal. However, it may be less than or equal to the individual specifications applicable to the specific lamp.

6.27.6. Orientation

In accordance with the individual specifications applicable to the specific lamp used for the answer-back signal.

- 6.27.7. Electrical connections
- 6.27.7.1. The answer-back signal shall only operate under the park condition of a vehicle.
- 6.27.7.2. No sharp variation of intensity shall be observed during transition of variation in luminous intensity and/or apparent surface of the answerback signal.
- 6.27.7.23. If the answer-back signal flashes, the frequency shall not exceed [2.0] Hz.
- 6.27.7.34. The lamps may operate in combination.
- 6.27.7.45. The conditions of paragraphs 5.11. and 5.12. and for the electrical connections of devices used for the Answer-back signal may not apply.
- 6.27.8. Tell-tale

No special requirement.

- 6.27.9. Other requirements
- 6.27.9.1. The answer-back signal shall be provided by approved lighting and light-signalling devices according to the UN Regulation and exterior courtesy lamps where in both cases, thewhose maximum luminous intensity does not exceed 7001 cd fon or above the HH line where front and rear fog lamps and stop lamps are not permitted to be used.

Compliance with this requirement shall be demonstrated by the applicant, using a test report or other means of verification accepted by the Type Approval Authority. The information shall be indicated in the communication form.

- 6.27.9.2. The answer-back signal may only be activated automatically in conjunction with the locking and unlocking of the door(s), the opening and closing of the doors, the detection of the vehicle user approaching with the vehiclekey and in accordance with other conditions prescribed as conditions similar to this stated by the manufacturer.
- 6.27.9.3 The answer back signal may flash and/or vary in luminous intensity and/or apparent surface.
- 6.27.9.43. The duration of the optical indication of the answer-back signal shall not exceed [3] seconds."

— コメントの追加 [MG30]: OICA can accept this deletion.

コメントの追加 [MG31]: OICA does not understand why we are not permitted to be brighter below the HH line? The answer back signal typically uses the low beam and this would be prohibited with Japan's deletion.

コメントの追加 [K32R31]: JP_1207:Concerns about the addition of HH line provisions have been dispelled. We would also like to accept OICA's editorial corrections.

コメントの追加 [MG33]: In order to stay technology neutral, OICA proposes to remove the specific reference to a key.

コメントの追加 [K34R33]: JP_1207:No problem.

Insert a new paragraph 6.28., to read:

<mark>"</mark>6.28. Energy indicator lamp

Presence

Optional.

6.28.2. Number

No special requirement.

[However, if approved lamps are used then the number shall not exceed the individual specifications applicable to the specific lamp.]

6.28.3. Arrangement

No special requirement.

[However, if approved lamps are used then the arrangement shall be in accordance with or less than the individual specifications applicable to the specific lamp.

6.28.4. Position

No special requirement.

[However, if approved lamps are used then the position shall be in accordance with the individual specifications applicable to the specific

However, if the height changes depending on the operating conditions of the propulsion system, it shall be less than or equal to the individual specifications applicable to the specific lamp.]

Geometric visibility

No special requirement.

[However, if approved lamps are used then the geometric visibility shall be in accordance with or less than the individual specifications applicable to the specific lamp.]

6.28.6. Orientation

No special requirement.

[However, if approved lamps are used then the orientation shall be in accordance with the individual specifications applicable to the specific lamp.]

6.28.7. **Electrical connections**

> The requirements of paragraphs 5.11., 5.12. and for the electrical connections of devices used for the Energy indicator-lamp do not apply.

Tell-tale

No special requirement.

6.28.9. Other requirements

6.28.9.1 If not otherwise specified, all lighting and light-signalling lamps may be used as an energy indicator-lam

The energy indicator-lamp shall not be switched ON unless the vehicle is stationary and one or more of the following conditions exist:

(a) the vehicle is connected to the energy grid; or

the energy indicator-lamp is switched ON manually by the vehicle

6.28.9.3. The luminous intensity of energy indicator lamp shall not exceed [150 cd].

コメントの追加 [K35]: JP_1207:The need for energy indicator requirements is recognised. However, each requirement should first be defined in other relevant GRs (mainly GRSP) as a basis for the lighting of the Energy Indicator.

In addition, Japan has the following 4 concerns with the OICA

proposal.

1. colour specifications (5.15.)

2. the absence of a quantity rule (6.28.2.)
3. always illuminated (6.28.9.2.(a))

4. no definition of failure (6.28.9.5.)

Early resolution of the above is required. If difficult, energy indicator should be excluded from the SIG Step 1 proposal and dealt with in Step 2.

コメントの追加 **[K36]:** Mark>>Energy Indicators are already common place on all electric vehicles therefore OICA insists to keep this as part of step 1.

コメントの追加 [MG37]: OICA believes a slightly higher value is required to be visible in daytime conditions. 150cd is proposed (was 50cd).

コメントの追加 [K38R37]: JP_1207:The original 50 cd was proposed by OICA. Evidence is sought that 150cd is required for daytime. However, if approved lamps are used for the energy indicator lamp, the luminous intensity shall not exceed the required maximum of the lamp concerned according to the following conditions:

- if the ambient light conditions outside vehicle are above 1,000 lux (measured according to the requirements of Annex 13), the luminous intensity above the H-H-line shall not exceed |700 cd|.
- if the ambient light conditions outside vehicle are less than 1,000 lux (measured according to the requirements of Annex 13), the luminous intensity above the H-H line-shall not exceed |300 cd|.

[Compliance with this requirement shall be demonstrated by the applicant, using a test report or other means of verification accepted by the Type Approval Authority. The information shall be indicated in the communication form.]

- 6.28.9.4. When the energy indicator lamp is switched ON manually by the vehicle user according to 6.28.9.2, the duration of the indication shall not exceed [10] seconds.
- 6.28.9.5. Energy indicator lamps may flash when a failure related to the energy transfer is detected. However, if approved lamps are used for the energy indicator lamp, the duration of this flashing failure indication shall not exceed 103 seconds."

Insert a new paragraph 6.29., to read:

"6.29. Lamp test mode

Where not otherwise specified in this paragraph and its sub-paragraphs, the individual requirements for the lamps used for lamp test mode do not apply.

6.29.1 Presence

Optional.

6.29.2. Number

No special requirement.

[However, if approved lamps are used then the number shall be in accordance with or less than the individual specifications applicable to the specific lamp.]

6.29.3. Arrangement

No special requirements.

[However, if approved lamps are used then the arrangement shall be in accordance with or less than the individual specifications applicable to the specific lamp.]

6.29.4. Position

No special requirements.

[However, if approved lamps are used then the position shall be in accordance with the individual specifications applicable to the specific lamp.

However, if the height changes depending on the operating conditions of the propulsion system, it shall be less than or equal to the individual specifications applicable to the specific lamp.]

6.29.5. Geometric visibility

No special requirements

ーコメントの追加 [MG39]: OK for OICA.

コメントの追加 [MG40]: OK for OICA

コメントの追加 [MG41]: 3 seconds in not enough time to signal a failure. There is no good justification to limit this rare condition to 3 seconds.

コメントの追加 [K42R41]: JP_1207:Problems that are not defined as failures should be solved first.

As for how many seconds, this is after the failure requirements have been fixed.

[However, if approved lamps are used then the geometric visibility shall be in accordance with or less than the individual specifications applicable to the specific lamp.]

6.29.6. Orientation

No special requirements

[However, if approved lamps are used then the orientation shall be in accordance with the individual specifications applicable to the specific lamp.]

6.289.7. Electrical connections

The requirements of paragraphs 5.11., 5.12. and for the electrical connections of devices used for the lamp test mode do not apply.

6.2829.8. Tell-tale

No special requirement.

- 6.29.9. Other Requirements.
- 6.29.9.1 The lamp test mode may be switched ON [;
 - (a)] manually by the vehicle user [and/or
 - (b) automatically.

If automatic, activation shall only be possible where a key is detected and the vehicle is within a geofenced location programmed by the vehicle user suitable for such a test (e.g., within a safe site), or in accordance with conditions similar to this as stated by the manufacturer and accepted by the Technical Service. If the activation condition is no longer satisfied or the distance between driver and the vehicle and/or trailer exceeds [6] m, each function/lamp shall be switched OFF immediately.]

6.29.9.2. Each function/lamp tested shall be switched ON and remain switched ON for a minimum of [40.5] second. No more than one function/lump should be switched ON at the same time. The duration of switched ON for all function/lamp shall be the same.

In addition, each function/lamp shall not be switched ON again within [3] seconds after it is switched OFF.

[In addition, each function/lamp shall not be switched ON not more than once during the entire time (both ON and OFF cycle) of operation of the lamp test mode.]

- 6,29.9.3. The duration of Lamp test mode shall not exceed [180] seconds. The lamp test mode may be manually re-initiated by the vehicle user. However, it shall always be switched OFF automatically when the vehicle is in the normal condition of use.
- 6.29.9.4 The lamp test mode shall be provided by approved lighting and lightsignalling devices according to the UN Regulation and exterior courtesy
 lamps. "

Annex 1,

Insert new items 9.31.and 9.32. to read:

- "9.31. Lamps allowed to be used under park condition:
- 9.31.1. Answer-back signal: yes/no².....
- 9.31.1.1 Maximum luminous intensity on or above the H-H line

コメントの追加 [K43]: Additional automatic lighting requirements.
Reference:R79 5.6.1.2.3. 「If the continuous actuation is interrupted

Reference:R79 5.6.1.2.3. If the continuous actuation is interrupted or the distance between vehicle and remote control device exceeds the specified maximum RCP operating range (SRCPmax) or the signal between remote control and vehicle is lost, the vehicle shall stop immediately. J

コメントの追加 [MG44R43]: We understand the implementation for RCP but not for Lamp test mode. The detection would be done by the vehicle and not the trailer. Trailers are often longer than this distance. The justification given does not satisfy the need for such a complex solution.

コメントの追加 [K45R43]: JP_1207:Added 'and/or trailer'.

コメントの追加 [MG46]: Could Japan accept 0.5 seconds as a minimum duration for the lamp test mode? We propose to harmonize the requirement from 6.29.9.2 with 6.5.9, in order not to introduce another new frequency requirement into UN Reg 48.

コメントの追加 **[K47R46]: JP_1207:**0.5 seconds is acceptable.

コメントの追加 [MG48]: OICA is against keeping the duration the same for each lamp. Some functions such as low beam may illuminate different sections or areas. Also some smaller functions may be harder to identify in daylight so turning them on for longer would be useful.

コメントの追加 [K49R48]: JP_1207:Alternatives are presented.

コメントの追加 [MG50]: OICA is against this requirement in the case of single functions. Not all lamps are multi-function. This is over-regulation.

コメントの追加 [K51R50]: JP_1207:Alternatives are present

コメントの追加 [K52]: While taking into account the discussions with OICA during the 87th GRE, we have also set limits on the deliberately floridly designed lighting methods that we in Japan are concerned about.

コメントの追加 [MG53]: OICA supports the removal of this constraint.

コメントの追加 [MG54]: This would prohibit the testing on lamps approved according to national legislation. Exterior courtesy lamps are not approved lighting devices. Suggest to remove this requirement as it does not help.

コメントの追加 [K55R54]: JP_12-6:Added 'and exterior courtesy lamps'.

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9.31.2.	Lamp test mode:	yes/no ²
9.31.3.	Energy indicator lamp:	yes/no ²
9.31.3.1	Luminous intensity:	
9.32	Lamps that the luminous intensity is less than [0.5] cd per lam	
	park condition of a avehicle:	yes/no ²
9.32.	Lamps according to national	Hegislation: yes/no ² "

II. Justification

A justification will be submitted as a separate informal document.

コメントの追加 [MG56]: Yes/No is not correct. OICA proposes to list the lamps that are approved according to national legislation.

コメントの追加 [K57R56]: Mark>>OICA suggests to list the lamps approved according to National legislation instead of yes/no.