

1	2	(3)	4	5	(6)	(7)
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E 3	Whole Document		ge	We have a positive opinion on the draft prepared by AVLI. For the time being we do not see the need for further substantial/technical changes.		
E12	Title	---	ge	Due to the general change of the scope and the high number of new requirements this amendment must lead to a new Series 01 of amendments to have a distinction for the stage of technical provisions fulfilled by the vehicle type. The next stage as proposed must be 02 series of amendments then.	Proposal for 01 Series of amendments to Regulation No. 86 [...]	
CEM A/Ku hn	2.20.3		ed	pane	Panel	
CEM A/Ku hn	2.20.3		ed	Long vehicle	Leave it out; it is not defined	
CEM A/A GCO /Fen dt (D)	2.20.3		ed	Writing mistakes in " <i>Signalling pane or signaling foill</i> " means ...	" <i>Signalling panel or signalling foil</i> "	

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E12	4.2	---	ed	<p>The stage of fulfilled requirements must be indicated in the type-approval number. The proposed text in principal is taken over from UNECE-R48.05, Point 4.2.</p> <p>→the model of the type-approval marking in Annex 2 – page 58 shall be amended accordingly (no proposal in this comments – use the standard format)</p>	<p>4.2. An approval number shall be assigned to each type approved. Its first two digits (at present 0001, <u>corresponding to the 01 series of amendments for the Regulation in its original form</u>) shall indicate the series of amendments incorporating the most recent major technical amendments to the Regulation. The same Contracting Party may not assign the same number to another vehicle type or to the same vehicle type submitted with equipment not specified in the list referred to in paragraph 3.2.2. above subject to paragraph 7. of this Regulation.</p>	
E12	5.1.1		ed	<p>Current issue of ISO 1724 is 2003; all former issues are repealed. The title of that standard should be aligned to its present title.</p> <p>Current issue of ISO 1185 is 2003; all former issues are repealed. The title of that standard should be aligned to its present title.</p>	<p>5.1.1. Vehicles must be fitted with the permanently connected socket outlet specified in ISO standard 1724 (1980) (Electrical connections for vehicles with 6 or 12 volt electrical systems applying more specifically to private motor cars and lightweight trailers or caravans); <u>2003 (Road vehicles - Connectors for the electrical connection of towing and towed vehicles - 7 pole connector type 12 N (normal) for vehicles with 12 V nominal supply voltage)</u>, or ISO 1185 (1975) (Electrical connections between towing and towed vehicles having 24 volt electrical systems used for international commercial transport purposes); <u>2003 (Road vehicles -- Connectors for the electrical connection of towing and towed vehicles -- 7-pole connector type 24 N (normal) for vehicles with 24 V nominal supply voltage)</u> or both when they have a connection for attaching trailed vehicles or mounted machines.</p>	

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E 17	5.9.1		Te	Flashing of amber side-marker lamps could be clearly allowed in paragraph 5.9.1. The current paragraph 6.18.9 already says: "Rearmost side-marker lamps shall be amber if they flash with the rear direction-indicator lamp."	Current text: Direction-indicator lamps and the vehicle-hazard warning signal shall be flashing lamps. New text: Direction-indicator lamps and the vehicle-hazard warning signal shall be flashing lamps. Amber side-marker lamps may be flashing lamps.	
E 4	6.1.1.	Main-beam Headlamps	ge	For fast tractors please consider making the installation of main-beam headlamps mandatory.	<i>Presence:</i> <i>Optional on vehicles of category T</i> <i>However, two main-beam headlamps are mandatory in case the maximum vehicle (design) speed exceeds 40 km/h</i> <i>Prohibited on vehicles of categories R and S</i>	
E12	6.1.1		Te	It is not acceptable, that a vehicle running up to 80 km/h has no main-beam headlamp. Illumination of dipped-beam headlamps is only ~ 30 m (see 6.2.6.1.2). For speeds over 40 km/h a longer stopping distance than 30 m is required. The illumination of the street in front of the vehicle must enable the driver to stop the vehicle inside the illuminated area. Such provision of main-beam headlamp for vehicles running faster than 40 km/h is state of the art since decades. There is no reason to decrease the present level of traffic safety.	6.1.1. Presence: <u>Mandatory for vehicles of Category T having maximum design speed of more than 40m km/h.</u> Optional on <u>other</u> vehicles of category T. Prohibited on vehicles of categories R and S.	

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E 17	6.1.1		Te	Main-beam headlamps could be mandatory in fast tractors.	Current text: Optional on vehicles of category T. Prohibited on vehicles of categories R and S. New text: Mandatory on vehicles of category T with a maximum design speed above 40 km/h. Prohibited on vehicles of categories R and S. Optional on other vehicles.	
E12	6.2.6.1.2		Te	The "15 m" should be reviewed. It might be reasonable to change to 20 m to have an illuminated area of 40 m in front of the vehicle	6.2.6.1.2. The dipped-beam headlamps must be aligned in such a way that, measured at 15 m from the lamp, the horizontal line separating the lit zone from the unlit zone is situated at a height of equivalent to only half the distance between the ground and the center of the lamp.	
E 17	6.2.9		ge	What was the reason to delete text "The requirements of paragraph 5.5.2. shall not apply to the passing lamps"? The 5.5.2 is: "Be symmetrical to one another in relation to the median longitudinal plane;". Passing lamps have still asymmetrical beams.	Undelete the text.	

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E12	6.3.6.1		Te	To avoid the situation, that front fog lamps produce glare	[new] 6.3.6.1 or 6.3.7]: Vertical orientation: the vertical orientation shall be lower than that for the dipped-beam headlamps.	
E 1	6.5.1		Te	For tractors exceeding a certain length it is not sufficient to further permit Arrangement D due to the limited lateral visibility of the DI. The accident study from German GDV of 2010 showed that a majority of the accidents with agricultural vehicles occur during turning and crossing roads. A reason could be the insufficient visibility of the DI. This can be improved by the proposal to prohibit arrangement D for tractors exceeding a certain length.	Arrangement A and D shall be allowed only on vehicles of category T whose overall length does not exceed 4,600 mm and in the case of which the distance between the outer edges of the illuminating surfaces is not more than 1.60 m. Arrangements B and C shall apply to all vehicles of category T.	
AVLI Sec	6.5.1 and 6.5.3.2		ed	Category 2 is not existing. It should read "Category 2a"	6.5.1 ... For vehicles of categories R and S category 2 a lamps shall be used. 6.5.3.2. For vehicles of categories R and S: Two rear direction-indicator lamps (category 2 a).	
CEM A/Ku hn	6.5.2		ed	For vehicles of categories R and S category 2 lamps shall be used.	48 has a drawing, should we not add a drawing	
CEM A/Ku	6.5.3.2.		te	Two rear direction-indicator lamps (category 2).	Two rear direction-indicator lamps (category 2a).	

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hn						
E 4	6.5.3.2.	Rear Direction-Indicator Lamps	te	Should you use category 2a or category 2b? Or can you use both categories?	Specify which category(y)(ies) can/shall be used	
E 4	6.5.4.2. 6.7.4.1. 6.9.4.1. 6.9.4.2. 6.14.4.1. 6.14.4.2. 6.17.4.1.		(ge?) (te?) (ed?)	<p>6.5.4.2. For vehicles with a maximum width not exceeding 1,300 mm ...</p> <p>6.7.4.1. ... if the overall width of the vehicle tractor is less than 1,400 mm</p> <p>6.9.4.1. ... where the overall width of the vehicle tractor is less than 1,400 mm.</p> <p>6.9.4.2. For vehicles with a maximum width not exceeding 1,300 mm ...</p> <p>6.14.4.1. ... where the overall width of the vehicle tractor is less than 1,300 mm.</p> <p>6.14.4.2. For vehicles with a maximum width not exceeding 1,300 mm ...</p> <p>6.17.4.1. ... the overall width of the vehicle is less than 1,300 mm</p> <p>In these paragraphs two different values for the width (1,300 mm and 1,400 mm) are used for applying certain exemptions. This seems a bit peculiar/inconsistent...</p>		

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E 17	6.7.5.		ed	Text: "15° above and below the horizontal" is written twice.	Delete the duplicated text.	
E12	6.8.1		ed	To avoid misinterpretations, that Category T vehicles smaller than 1600 mm need no front position lamps.	6.8.1. Presence: Mandatory on all vehicles of category T. Mandatory on all and vehicles of categories R and S exceeding 1,600 mm in width. Optional on other vehicles of categories R and S.	
CEM A/Ku hn	6.8.1.		te	Presence: Mandatory on all vehicles of category T and vehicles of categories R and S exceeding 1,600 mm in width. Optional on other vehicles of categories R and S.	To be reviewed in line with end outline marker lamps	
CEM A/K RON E	6.8.1	1	te	Why are front position lamps already mandatory on vehicles which are exceeding 1.600 mm in width? Why is this requirement so important?	Mandatory on all vehicles of category T and vehicles of categories R and S exceeding 1,600 2.550 mm in width. Optional on all other vehicles of category R and S.	

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CEM A/Kuhn	6.8.4.1.		te	shall be not more than 400 mm from the extreme outer edge	For R &S the light is obscured by the pulling vehicle see front retroreflector	
CEM A/Kuhn	6.8.5.		te	the angle of 10° inwards may be reduced to 5° if the shape of the bodywork makes it impossible to keep to 10°.	For R&S there should be an exemption to 0	
E 17	6.9.8.		ed	Reference "(see 5.11)" should be in paragraph 6.9.7 (Electrical connections). This is the case with other lamps.	Move text "(see paragraph 5.11)" to paragraph 6.9.7.	
E 4	6.12.1.	End-outline marker lamps	ge	Why only mandatory when the vehicle's width exceeds 2,550 mm? Why not consider making it - as in R.48 - mandatory from widths exceeding 2,100 mm?	<i>Optional on vehicles exceeding 1,80 2,10 1,800 mm in width. Mandatory on vehicles exceeding 2,550 2,100 mm in width. Prohibited on all other vehicles.</i>	
CEM A/Kuhn	6.12.1.		te	Presence:	To be reviewed in relation with end outline marker lamps.	

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CEM A/K RONE	6.12.1	1	te	End-outline-marker-lamps which are mounted on machines exceeding 2.550 mm in width are not state of the art. The lighting and signalling parts of agricultural vehicles have to be mounted as close to the machine as possible, because if they are mounted as close as possible to the extremer outer edge of the vehicle the possibility of lamp or panel destruction is given.	Optional for vehicles exceeding 1,800 mm in width. Mandatory on vehicles exceeding 2.550 mm in width. Prohibited for all other vehicles.	
CEM A/Kuhn	6.12.2.		te	Two visible from the front and two visible from the rear.	Two or four visible from the front and two or four visible from the rear.	
CEM A/Kuhn	6.12.4.2.		te	. Height:	What about the low position at the rear?	
CEM A/S DFD	6.14.2		te		Insert after “Two or four (see paragraph 6.14.5.1.) The performances of these devices shall conform to the requirements concerning Class IA or IB retro-reflectors in Regulation No. 3. Additional retroreflecting devices and materials (including two retro-reflectors not complying with paragraph 6.14.4. below), are permitted provided they do not impair the effectiveness of the mandatory lighting and light-signalling devices. (see reg. No. 48, 6.14.2 and proposal no. 86, 6.15.2)	

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E 4	6.15.4.3.	Side retro-reflectors, non triangular	ge	Why (significantly) different requirement than in R.48? In R.48 the 'middle third' is addressed... here it's not. In R.48 the distance between two retro-reflectors on the same side is 3 m (or exceptionally 4 m), but not 6 m.		
CEM A/Kuhn	6.15.4.3.		te	One reflector must be not more than 3 m from the foremost point of the tractor vehicle , and either the same reflector or a second reflector must be not more than 3 m from the rearmost point of the tractor vehicle . The distance between two reflectors on the same side of the tractor vehicle must not exceed 6	Identical to side lamps	
CEM A/KRON E	6.15.4.3		te	Almost all international standards define the distance between two side retro-reflectors as 3 m and the distance between a second reflector and the rearmost point of the vehicle as 1 m. Why deviate from this standard?	One reflector must not be mounted more than 3 m from the foremost point of the tractor vehicle and either. Neither the same reflector nor second reflectors must be not are-mounted more than 3 1 m from the rearmost point of the vehicle. The distance between two reflectors on the same side of the tractor vehicle must not exceed 6 3 m .	

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CEM A/K RONE	6.17.1	1	te	Why are front retro-reflectors mandatory on all vehicles of categories R and S? Usually, the requirements must be in accordance with the requirements for the front position lamps. Nowadays, a front reflector is already integrated in many position lamps.	Optional on vehicles of category T. Mandatory on vehicles of categories R and S exceeding 2.550 mm in width.	
CEM A/Kuhn	6.17.4.1.		te	not be more than 400 mm from the extreme outer edge	not be more than 150 mm from the extreme outer edge	
CEM A/Kuhn	6.17.4.3.		te	At the front of the vehicle.	No requirement	
CEM A/Kuhn	6.17.5.		te	vertical angle below the horizontal may be reduced to 5° i	0 degrees	
E 4	6.18.1.	Side-marker lamps	ge	For long vehicles consider making the installation of side-marker lamps mandatory.	<i>Presence:</i> <i>Optional</i> <i>Mandatory: On all vehicles the length of which exceeds 6 m,</i> <i>Optional: On all other vehicles.</i>	

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E 17	6.18.1.		te	Presence of side-marker lamps is "Optional". Side-marker lamps could be mandatory in some vehicles. Finland requires currently side-marker lamps for agricultural trailers over 6 m in length, which are towed by our national over 40 km/h "traffic tractors".	New text: Mandatory on all vehicles exceeding 6 m in length and with a maximum design speed above 40 km/h. Optional on other vehicles.	
CEM A/A GCO /Fendt (D)	6.19.7.1.		te	It has to be possible that the operator could switch OFF the daytime running lamps while working in the field.	To add in 6.19.7.1. the following text: "It should be possible to switch the daytime running lamps OFF if the tractor is running with a speed below 25 km/h. In this case the daytime running lamps shall switch ON automatically if the tractor reaches a speed of 25 km/h."	
CLEPA	6.21		te	To align the provisions of ECE R86 with latest ECE 48 regarding the fitment of conspicuity markings. Several improvements have been introduced into R48 that should be reflected in R86.	Introduce provisions for number, geometric visibility, position etc. for conspicuity marking	
CLEPA	6.21.1		te	To align the provisions of ECE R86 with ECE 48 (after 2011) for trailers.	Optional on vehicles of category T. Mandatory on vehicles of categories R and S.	

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CEM A/Kuhn	6.25.4.2.1.		te	Rear retro reflectors for overlength parts or components within a maximum height of 4,000 mm .	What is overlength	
E 17	6.25.4.2.1		te	The text is: "Rear retro reflectors for overlength parts or components within a maximum height of 4,000 mm." This paragraph is not in latest draft of EU RVFSR. Are the overlength parts (which are not defined in Reg. 86) in the scope of type-approval Regulation or is this more like a road-use requirement?	Delete the paragraph 6.25.4.2.1	
CEM A/Kuhn	6.25.5.1.		te	If it is impossible to observe the above position and visibility requirements, four retro-reflectors may be fitted in accordance with the following installation specifications:	One pair must comply with the width specificaitons, one pair must comply with the height specification	
CEM A/Kuhn	6.26		te	Signalling panel and signalling foils	Add un-ece regulation (they need to be approved)	
CEM A/Kuhn	6.26.1		te	Optional on vehicles of category S with a total width not exceeding 2.55 m.	Is it wise to allow this?	
E 4	6.26.1.	Signalling panel and signalling foil	ge	Mandatory on vehicles of category S wider than 2,55 m and optional when they're less wide. What about vehicles of categories R and T...?		


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CEM A/K RONE	6.26.1	2		<p>Why are signalling panels and signalling foils mandatory on all vehicles of categories S exceeding 2.550 mm?</p> <p>There are two different reasons for mounting signalling panels on machines. First, there is the possibility of attachment parts posing a traffic hazard. Second, there is the possibility of an excess width.</p> <p>So there should be a difference in mounting these panels between both possibilities.</p>	<p>Mandatory on vehicles of category S with a total width of more than 2.55 2.750 mm. Optional on vehicles of category S with a total width not exceeding 2.55 2.750 mm.</p> <p>Mandatory on vehicles of category S with attachments parts posing a traffic hazard.</p>	
CEM A/Kuhn	6.26.2		te	Two or four (Annex 6).	For indication of the over 2.55 2 to the front and 2 to the rear are a minimum.	
CEM A/K RONE	6.26.4	2	te	<p>If signalling panels are mounted as near as possible to the extreme outer edge of the vehicle, the chance of destruction is very high. Therefore, it is necessary to have a chance to mount the panel, especially in case of parts of the attachments, posing a traffic hazard within the machine outline.</p> <p>Marking an excess width it is really important to have a short distance between the outer edge of the vehicle and the beginning of the signalling panel, so that the width of the vehicle is visible.</p> <p>An example:</p>	<p>That point on the illuminating surface which is furthest from the vehicle's median longitudinal plane shall not be more than 100 mm from the extreme outer edge of the vehicle, when exceeding width of 2.750 mm.</p> <p>This value may increase if the shape of the bodywork makes it impossible to keep within 100 mm.</p> <p>In case of attachments parts posing a traffic hazard the value should be not higher than 400 mm.</p>	

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CEM A/Kuhn	6.26.5			No individual specifications	Visible from the rear and visible to the rear	
E 4	Annex 6	Table 2	ge	<p>Directly under table 2 it reads:</p> <p><i>Warning boards of Form A may be combined with lamps, if the surface of the boards covered by the lamps does not exceed 150 cm².</i></p> <p>Not clear what is meant exactly... and what kind of lamp(s) can be used for this...?</p>		

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AVLI 05-05e Comments received on AVLI 05-01e

Date: 2014-10-31	Document: Comments on AVLI 05-01e Proposal R 86 to become Document ECE/TRANS/WP.29/GRE/2015-Xe
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E 17	Annex 6	Paragraph 3	te	<p>The text is: "Signalling panels which comply with the requirements of this Regulation are marked with the number of this Regulation and the name of the manufacturer."</p> <p>Is the signalling panel marking according to Reg. 86 really necessary? It creates some additional burden for manufacturers. It is not an actual type-approval marking, which could be confusing. There is no corresponding requirement with conspicuity markings in Reg. 48. Anyway, the reflecting materials shall be marked according to Regulation No 104.</p>	Delete the paragraph 3 (Identification) in Annex 6	

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