

## Template for comments and secretariat observations

Date:	Document: <b>GRE-73-02 Proposal for draft amendments to Regulation No. 86 (Installation of lighting and light-signalling devices for agricultural tractors)</b>
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1	2	(3)	4	5	(6)	(7)
CP <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB <i>(in English!)</i>	Proposed change by the MB <i>(in English!)</i>	Secretariat observations on each comment submitted
TD/ KR ON E	(EU) 2015/208 6.5.1			For turn indicators of category II there are no angles of geometric visibility for these lamps. The paragraph says: "For trailers and towed machines category 2 lamps shall be used." But you can't find angles in this clause and in appendix 2 also. In the UNECE R 86 is mentioned, that for vehicle of categories R&S turn indicator of category 2a should be used.	Angles should be defined or the class of the turn indicator should be changed.	No change in R 86 necessary.
TD/ KR ON E	6.15.4.3			The distance between the reflectors is not in line with the state of the art.	"6.15.4.3. Length: One reflector shall be not more than 3 m from the foremost point of the vehicle, and either the same reflector or a second reflector shall be not more than <del>3</del> 1 m from the rearmost point of the vehicle. The distance between two reflectors on the same side of the vehicle shall not exceed <del>6</del> 3 m."	Already corrected in R 86.
TD/ KR ON E	6.17.5.1.			The point 6.17.5.1. is not fully completed. Here are some requirements missing.  The same problem is in the UNECE R 86. Here are also some requirements missing.	6.17.5.1. If it is impossible to observe the above position and visibility requirements, four front retro reflectors may be fitted in accordance with the following installation specifications: 6.17.5.1.1. If fitted, two reflectors shall keep within the maximum height of 1 <del>2</del> 500 mm above the ground. A distance of at least 300 mm between the interior edges of the front retro-reflectors shall be observed, and they shall have a vertical angle of visibility above the horizontal of 15°. <b>6.17.5.1.2 The other two shall keep within a</b>	Change as proposed. Align with 6.25.5.1.1 and 6.25.5.1.2.

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					<p>maximum height of 2 500 mm above the ground and shall be bound by the requirements of point 6.17.4.1.</p> <p>6.17.5.1.3. The combination of the two pairs shall meet the requirements for geometric visibility as specified in point 6.17.5.</p>	
TD/ KR ON E	6.25.			<p>The number of the ECE-Regulation which the rear triangular reflector has to be approved is missing.</p> <p>In ECE R 86 it's correct.</p>	6.25. Rear retro-reflectors, triangular <b>(UNECE Regulation No 3, as referenced in Annex I)</b>	No change in R 86 necessary.
TD/ KR ON E	6.25.5.1.1			<p>This paragraph is not in line with 6.25.4.2 It should be 1500 mm.</p>	6.25.5.1.1. Two retro-reflectors shall keep within the maximum height of 900 mm above the ground. However, this upper limit may be increased to not more than 1 <del>2</del> 500 mm if it is impossible to keep within the height of 900 mm without having to use fixing devices liable to be easily damaged or bent.	No change necessary. If only two are fitted, 1500 mm are allowed. In case of mounting four, the height requirement may be more restrictive.

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TD/ KR ON E	6.25.5.1.2			Wrong reference in this point. It should be 6.25.4.1.  The same wrong reference you can find in the UNECE R 86.	6.25.5.1.2. The other two retro-reflectors shall keep within a maximum height of 2 500 mm above the ground and shall comply with point 6.4425.4.1.	Change as proposed.
TN	5.9.1.			<b>Amber side-marker lamps may be flashing lamps.</b>	<b>Contradiction to ECE R91 and ECE R6</b>	Keep as it is as this is in alignment with R 48
TN	5.16.1.2.			<b>Locking shall be automatic.</b>	<b>Putting into practice does not work.</b>	Keep as it is as. State of the art for decades.
TN	6.2.6.1.1			<b>... lower the dipped beam by between 0.5 and 6 4 per cent;...</b>	<b>Mistake: ...0,5 and 6 per cent is confirm to EU (VO) 2015 /208 Annex XII</b>	Misunderstanding: "4" is strike through.
TN	6.5.1			<b>... categories (1, 1a, 1b, 2a, 2b and 5)...</b>	<b>Categorie 6 is missing, see 6.5.3.1.</b>	Change as proposed.
TN	6.7.2.			<b>Two S1 or S2 category devices and one S3 or S4 category device.</b>	<b>Additional: For vehicle category R and S two S1 or S2. See 6.9.4.3.</b>	Keep as it is as the text is clear enough..
TN	6.7.4.3.			<b>At the rear of the vehicle.</b>	<b>Additional: If the distance between stop lamps and rear point of the vehicle is more than 1 m, one third stop lamp in the middle of the vehicle is mandatory at the rear. Putting into practice does not work. E.g. crop protection sprayer.</b>	Keep as it is as the objective must be clarified.

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TN	6.12.1.			<b>Mandatory on vehicles exceeding 2,550 mm in width.</b>	<b>Putting into practice does not work, this means vehicles of class S. ...optional between 1800 and 2550mm ..</b>	Keep as it is as UNECE applies also outside EU where also T or R vehicles may exceed 2,55 m in width.
TN	6.18.4.3.				<b>Optional on vehicles of category S not exceeding 2,550 mm in width. Does not make sense for vehicle not exceeding 2,550 mm.</b>	Mistake?
TN	6.19.7.1			<b>Furthermore, any of the lamps referred to in paragraph 5.11. <u>may be switched ON</u> when the daytime running lamps are switched ON.</b>	<b>It should be better that the devices 5.11 must be switched on when... outer edges of the tractor are clear and in this case the rear lights of the trailer are ON too.</b>	Keep as it is.

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