

Questions and proposals concerning  
the Unique Identifier marking solution  
for  
Road Illumination Devices (RID),  
Light Signalling Devices (LSD) and  
Retro-reflective devices (RRD)

# Existing APPROVAL MARK

- **Example:**

One device type approved for Front Position Lamp and DRL functions including 6 variants



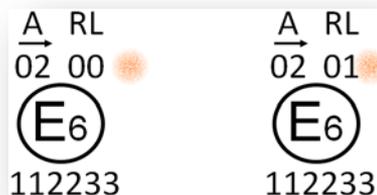
ALL 6 variants have the same marking on the visible area of the device **when the lamp is fitted on the vehicle** and specific additional information related to the variant characteristics (not visible when the lamp is fitted on the vehicle).

VARIANT active function(s)	Internal bezel	
	BLACK	ALUMINIZED
FPL + DRL	yes	yes
FPL only	yes	yes
DRL only	yes	yes

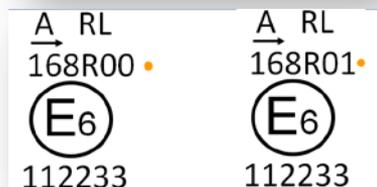
# Questions concerning the Unique Identifier marking solution concerning the example on the previous page

- If the existing approval marking (visible when the lamp is fitted on the vehicle) on the 6 variants is the same, how many unique identifiers markings will be demanded for this 6 variants of the device ?
- Today, in case of a type approval extension demanded due to an update of the series of amendments, the marking modifications are made only on the digit(s) (series of amendments) of the concerned function. What is the impact of such an extension on the unique identifier(s) for the 6 variants ? New unique identifier(s) marking(s) ?

Today initial marking and marking after extension on all 6 variants of the device



For the existing regulations in force



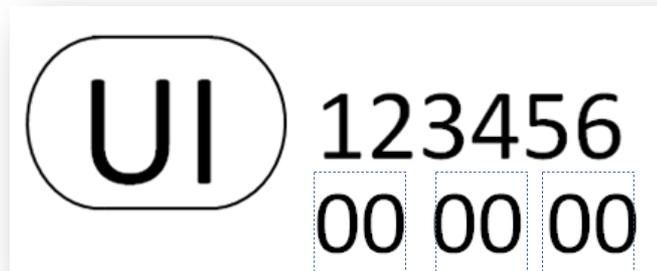
For RID, LSD and RRD regulations

# Proposal concerning the Unique Identifier marking

In many situation, when a device receives a type approval extension, the change of the unique identifier marking is not the optimized solution.

To have a clear view of the differences between devices before and after extensions (as shown on the previous page), we need an additional two digits marking for each of the three Regulations concerning lighting devices

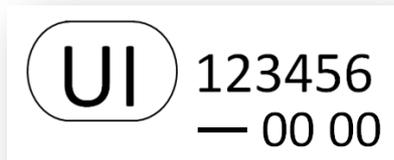
## Proposal:



two digits for : RID LSD RRD

if the product is concerned by all three regulations

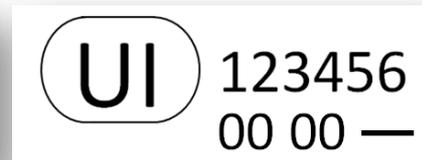
## Variants:



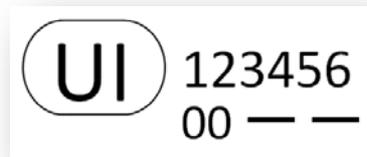
if no RID



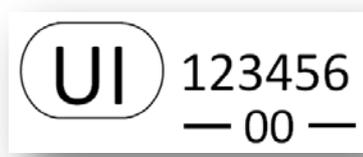
no LSD



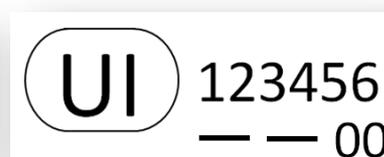
no RRD



if RID only



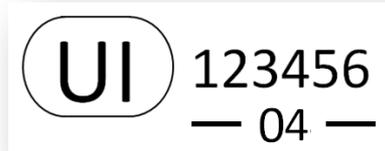
LSD only



RRD only

# Analysis of compliance of a lamp marked with the Unique Identifier marking with additional digits

- **Example:**



First conclusion:

This lamp is concerned by LSD regulation only and the type approval has been granted (years ago) under the 04 series of amendment.

Let's suppose that today LSD regulation in force is under the 06 series of amendment

## **Question:**

How can the authorities check, if the product meets the requirements of the LSD regulation under the 06 series of amendment in force today ?

## **Answer:**

**First step:** Access the DETA database, enter the unique identifier and note the lamp(s) (lighting functions) for which the device received type approvals

**Second step:** Access the LSD regulation documents for the 04 and 06 series of amendment and compare "Table 2" (see next page)

The "Table 2" of the 04 series of amendment indicate the index for each lamp (function) in force at the time of issue of the approval of this device, whereas "Table 2" of the 06 series of amendment indicate the indexes in force today.

**Conclusions on the next page**

# Analysis of compliance of a lamp marked with the Unique Identifier marking with additional digits

LSD regulation, Table 2: Series of amendments and change index

Lamp - Series of amendment 06 -	Change index
Daytime running lamp	03
Front direction indicator lamp	01
Front direction indicator lamp (Vehicle category L)	00
Front end-outline marker lamp	00
Front position lamp	01
Front position lamp (Vehicle category L)	00
Manoeuvring lamp	00
Parking lamp	00
Rear direction indicator lamp	02
Rear direction indicator lamp (Vehicle category L)	00
Rear end-outline marker lamp	00
Rear fog lamp	01
Rear position lamp	00
Rear position lamp (Vehicle category L)	00
Rear-registration plate illuminating lamp	00
Rear-registration plate illuminating lamp (Vehicle category L)	00
Reversing lamp	00
Side direction indicator lamp	00
Side marker lamp	01
Stop lamp	01
Stop lamp (Vehicle category L)	00
Stop lamp (central high mounted)	00

- 
- 
- 
- 

Lamp - Series of amendment 04 -	Change index
Daytime running lamp	02
Front direction indicator lamp	01
Front direction indicator lamp (Vehicle category L)	00
Front end-outline marker lamp	00
Front position lamp	01
Front position lamp (Vehicle category L)	00
Manoeuvring lamp	00
Parking lamp	00
Rear direction indicator lamp	01
Rear direction indicator lamp (Vehicle category L)	00
Rear end-outline marker lamp	00
Rear fog lamp	00
Rear position lamp	00
Rear position lamp (Vehicle category L)	00
Rear-registration plate illuminating lamp	00
Rear-registration plate illuminating lamp (Vehicle category L)	00
Reversing lamp	00
Side direction indicator lamp	00
Side marker lamp	01
Stop lamp	00
Stop lamp (Vehicle category L)	00
Stop lamp (central high mounted)	00

## Conclusions:

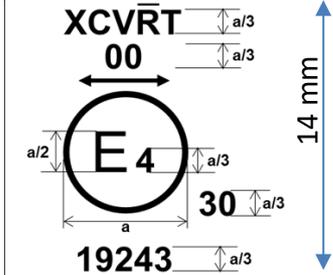
- In this example, between the 04 and 06 series of amendments, the index changed for: Daytime running lamp, Rear direction indicator lamp, Rear fog lamp and Stop lamp.
- If the device is concerned by at least one of the lamp (function) for which the index has changed, this device, type approved under the 04 series of amendment, does not meet the requirements of LSD regulation under the 06 series of amendment.
- If the device is concerned only by lamps (functions) for which the index is the same in the two tables, this device, type approved under the 04 series of amendment, meets also the requirements of LSD regulation under the 06 series of amendment.

# Benefit of the Unique Identifier marking solution

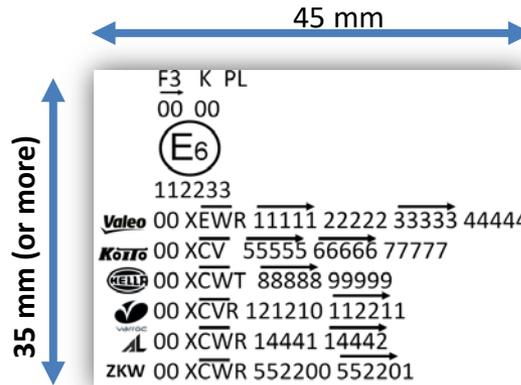
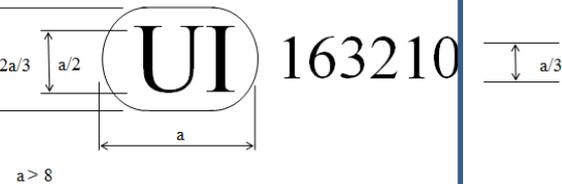
Example of a possible APPROVAL MARK OF A SINGLE ROAD ILLUMINATION DEVICE

**ALL this marking shall be visible when the lamp is fitted on the vehicle**

## minimum marking size



$a \geq 5$  mm on plastic  
 $a \geq 8$  mm on glass



The only visible part of the device when the lamp is fitted on the vehicle is the lens (80% optical area) Ø60mm

**OR**

Unique Identifier mark

