PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 48 (Installation of lighting and light-signalling devices)

Adaptive Front-lighting Systems (AFS)

TRANS/WP.29/GRE/2004/28/Rev.1

Transmitted by the expert from OICA

A. PROPOSAL

Paragraph 6.22.9.1., amend to read:

"6.22.9.1. An AFS shall be permitted only in conjunction with the installation of headlamp cleaning device(s) according to Regulation No. 45 10/ for at least those lighting units, which are indicated under item 9.3. of the communication form conforming to the model in Annex 1 to Regulation No. xxx, if the total objective luminous flux of these units exceeds 2000 lm per side, and which contribute to the class C (basic) passing beam."

B. JUSTIFICATION

The document GRE/2004/28 was prepared by the informal group on AFS for revision by GRE at its 53rd session. This document contained in para. 6.22.9.1. the proposal to limit mandatory equipment of headlamp cleaning devices when the luminous flux exceeds 2000 lm per side (see above). During the discussions at the 53rd GRE session several amendments were proposed subject to further discussions.

No safety benefits reason was however given to argue for the deletion, against OICA's recommendation, of the limitation to devices above 2000 lm. Under the technical point of view, nothing from an AFS headlamp differs from a conventional headlamp such that the cleaning devices should become mandatory. As it has always been considered within UNECE Regulation No. 48 that no impairing glare could be produced by lamps under the value of 2000 lm, similarly no impairing glare could be produced by AFS lamps under the same value of 2000 lm. There is no difference between "AFS lumens" and "conventional lumens".

Moreover, additional restrictions like that could make AFS a prohibitive cost such that a manufacturer could be reluctant to equip his vehicles with AFS. OICA is keen to voluntarily equip as many vehicles possible with AFS as a safety feature; mandatory cleaning devices could slow the process of wide AFS market introduction.

OICA hence requests that cleaning devices are mandatory for headlamps **above** 2000 lm only, as it is currently the case in UNECE Regulation No. 48.

- - - - -