Informal document No. **GRE-57-9**
(57th GRE, 26-30 March 2007,
agenda item 1.1.)

Transmitted by the expert from India

INDIA'S COMMENTS ON PROPOSED DRAFT GTR

Note: India suggesting the following amendments in GTR

The suggested modification of the current text of the Regulation is marked in **bold** characters.

A.1. PROPOSAL

Paragraph 3.3.4.1 amend to read :

3.3.4.1 "Light source" means one or more elements for visible radiation, which may be assembled with one or more transparent **/ semi transparent** envelopes and with a base for mechanical and electrical connection. …

A.2. PROPOSAL

Paragraph 3.3.12.2 amend to read

3.3.12.2 "Illuminating surface of a light-signalling device other than a retro-reflector" (paragraphs ~~3.5.1 to 3.5.9~~ **3.5.1, 3.5.3 to 3.5.9**. and 3.5.11. to 3.5.13.) means the orthogonal projection of the lamp in a plane perpendicular to its axis of reference and in contact with the exterior light-emitting surface of the lamp,…….

A.3. PROPOSAL

paragraph 4.5 amend to read

4.5. For all light-signalling devices when fitted to the vehicle, including those mounted on the side panels, the reference axis of the lamp must be parallel to the ground and perpendicular to the median longitudinal plane of the vehicle in the case of side retro-reflectors, **~~and of~~** side-marker lamps **and of Side direction indicators,** and parallel to that plane in the case of all other light-signalling devices. In each…….

A.4. PROPOSAL

paragraph 4.22 to amend as follows

4.22

- **a.** Direction indicator lamp -middle side on category 2 vehicles **~~with GVM > 8,000 kg~~ with length greater than 6 meters except for tractors intended for hauling semi trailer.**
- **b.** Center stop - category 1-1 and 2 - less **than ~~4,550 kg~~ 3500 kg** GVM except chassis cab and vehicles with open cargo space **and soft top vehicles**

A.5. PROPOSAL

Insert a new paragraph 4.23 to read:

4.23 The colours of the light emitted by the lamps are the following:

main-beam headlamp	**White**
dipped-beam headlamp	**White**
front fog lamp	**white or yellow**
reversing lamp	**White**
direction-indicator lamp	**Amber**
hazard warning signal	**Amber**
stop lamp	**Red**
rear registration plate lamp	**White**
front position lamp	**White**
rear position lamp	**Red**
rear fog lamp	**Red**
parking lamp	**White in front, red at the rear, amber if reciprocally incorporated in the side direction indicator lamps or in the side-marker lamps.**
side-marker lamp	**amber; however the rearmost side-marker lamp can be red if it is grouped or combined or reciprocally incorporated with the rear position lamp, the rear end-outline marker lamp, the rear fog lamp, the stop lamp or is grouped or has part of the light emitting surface in common with the rear retro-reflector.**
end-outline marker lamp	**White in front, red at the rear**
daytime running lamp	**White**
rear retro-reflector, non triangular	**Red**
rear retro-reflector, triangular	**Red**
front retro-reflector, non triangular	**identical to incident light */**
side retro-reflector, non triangular	**amber; however the rearmost side retro reflector can be red if it is grouped or has part of the light emitting surface in common with the rear position lamp, the rear end-outline marker lamp, the rear fog lamp, the stop-lamp or the red rearmost side-marker lamp.**
Cornering lamps	**White**
Retro-reflecting marking	**White or yellow to the side;** **Red to the rear**

***/ also known as white or colourless retro-reflector**

B.1 JUSTIFICATION FOR PROPOSAL A1.

There are some light sources used which have partially coated envelopes e.g. Coated Amber Bulbs. The envelopes of these sources are not completely transparent. Moreover many LEDs used as light sources , are also not transparent. As such we suggest including "Semi transparent" in the definition.

Philips Silver Vision Indicator Bulbs

SilverVision produces an amber colour light when lit and features a mirror surface when switched off. If your car has an orange / amber single function indicator bulb then the Philips Silver Vision light bulb will fit

B.2 JUSTIFICATION FOR PROPOSAL A2.

Item 3.5.2 relates to Hazard Warning Signal and is not related to Illuminating surface, as the illuminating device is same as direction indicator lamp.

B.3 JUSTIFICATION FOR PROPOSAL A3.

Since Side Direction Indicator are also mounted on the side of the vehicle similar to side marker lamps, their axis also must be perpendicular to the median longitudinal plane.

B.4 JUSTIFICATION FOR PROPOSAL A4.

a. Requirement of middle side indicator is to be related to the length of the vehicle rather than weight of the vehicle similar to Side marker lamps. Moreover on tractors intended to haul semi trailer, the middle side indicator will not do any additional function as these lamps will be shadowed by the semi trailer.
b. 4550 kg to be replaced by 3500 kg to bring in line with existing vehicle definition of ' N1 ' Class.
   There are many difficulties for installing the High mounted Stop Lamp on "Soft top" range of vehicles, such as:

* With the H M S L installed as per the guide lines, the entry and exit of the passengers at the rear is extremely difficult. There are chances of passenger head hitting with the lamp causing injuries.

* In field usage, generally the rear canopy window is wrapped and tied to roof canopy for ventilation purpose. With this kind of usage, if the lamp is located externally on the roof structure, the lamp would be hidden behind the rear canopy and the very purpose of the lamp is defeated.

The relevant photographs illustrating the constraints are shown below:

<table>
<tr><td>Photograph showing mounting of HMSL as per the requirement</td><td>  </td></tr>
<tr><td rowspan="3">Chances of passenger head hitting with the lamp causing injuries.</td><td>  </td></tr>
<tr><td>  </td></tr>
<tr><td>  </td></tr>
<tr><td>Photograph showing hiding of the HMSL due to the rear canopy window being wrapped</td><td>  </td></tr>
</table>

B.5 JUSTIFICATION FOR PROPOSAL A5.

The specification nowhere lays down the requirements regarding colour of lights emitted by various lamps, which is very important. The suggestion given by India is based on details given in paragraph 5.15 of ECE R48.
