

Transmitted by the expert from India

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agenda item 4(c) and 4(g))

INDIA'S COMMENTS ON NEW PROPOSAL FOR ECE R 48

India has the following comments on the amendments suggested by GTB and experts from Italy on the following documents:

ECE/TRANS/WP.29/GRE/2008/23
ECE/TRANS/WP.29/GRE/2008/29
ECE/TRANS/WP.29/GRE/2008/43

India proposes the following changes in ECE/TRANS/WP.29/GRE/2008/43

1. Amendment proposed to include **5.7.1.1** in ECE R48 need not be incorporated. This requirement may be covered by amendment to regulation of related devices.
2. In the proposed para **5.11.4.1**. the following may be added
(c) Installation requirements of respective position lamps
3. Relevant details given in ECE/TRANS/WP.29/GRE/2008/23 and ECE/TRANS/WP.29/GRE/2008/29 may be incorporated in this document appropriately.

Justification:

1. The proposed paragraph 5.7.1.1 in R 48 needs to be verified at the time of type approval of the device. Therefore, India feels that it is more appropriate for this requirement to be covered in the regulation of devices.
2. India agrees the proposals for substituting the function of front position lamps/rear position lamps with other lamps when they are put ON. Different additional requirements have been proposed in the above documents.

However, only geometric visibility has been included out of installation requirement. India feels that it is necessary to include other installation requirement also.
