

Transmitted by the expert from India

27 February 2009

REGULATION No. 37 (Filament lamps)
Proposal for Supplement 33 to the 03 series of amendments

India proposed to add following new filament light sources in ECE R 37 vide informal documents GRE-59-38 and GRE-59-42.

- P18/5W
- PR18/5W
- W10W
- WY10W
- WY16W

GTB has commented on these proposals vide Informal document No. GRE-60-06. India would like to offer following comments on the queries raised by GTB:

Sr#	GTB Query	India's comments
1.	GTB would like to understand from the Indian delegation why existing categories with nearly the same specifications do not fulfil the requirements of the Indian industry.	<p><u>P18/5W & PR18/5W:</u> Present light sources P21/5W, PR21/5W and P21/4W, PR21/4W in ECE R 37, if used on L category vehicles increase electrical load on engine system. Proposal to add P18/5W & PR18/5W in ECE R 37 was made with an understanding that these lamps can be more appropriate for L category vehicle application and can be used for other category vehicles. Use of these sources can save energy & reduce loading on engine and also meet 5:1 ratio of relative brightness with 18W filament.</p> <p><u>W10W:</u> W10W category lamp is proposed which can be used for signalling lamps such as direction indicator lamp, position lamp, etc. as an wedge based alternative to R10W and have more life compared to R10W.</p> <p><u>WY10W & WY16W</u> Amber versions of these bulbs will be useful for direction indicator for L category vehicles.</p>
2	GTB suggests in general that one cap key is not used for more than one category in order to avoid mis-insertion of light sources into lamps. For wedge base lamps however, this may not be possible. Therefore, in case of introduction of P18/5W and PR18/5W, new keys are recommended.	<p>Based on the inputs received from GTB, India would like to submit the revised proposal for P18/5W & PR18/5W with the following consideration:</p> <ul style="list-style-type: none"> - New cap keys for these light sources - Increase in Lm/Watt ratio to improve the efficiency of the light source.
3	GTB need more time to conclude on the WY16W proposal (including cap).	<p>As suggested by GTB, cap key used for W16W can be retained for WY10W and WY16W. India would like to withdraw a proposal of new cap key for these light sources.</p>
4	GTB recommends that light source proposals to GRE that require a new IEC cap should be aligned with the IEC timetable. Type approval of new categories should not be granted before the IEC process has come to a stage where the design of the cap is final (RVC or later stages like FDIS or publication of the amendment of the standard).	<p>For addition of new cap key in IEC, India would send a proposal through its national committee in India.</p>