

I. Proposal

A1. Proposal for Supplement 16 to the original series of amendments to Regulation No. 4

Paragraph 2. at the end, amend to read:

"....

- (c) two samples, equipped with the lamp or lamps recommended;
- (d) **in the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 5.7 of this Regulation. "**

Insert a new paragraph 5.7., to read:

- "5.7. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate ,with a test report or other means acceptable to the Authority responsible for type approval, compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2. "**

Annex 6, insert a new paragraph 1.2.4., to read:

- "1.2.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3 of Publication IEC 60809, Amendment [6] to Edition 2.**

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A2. Proposal for Supplement 23 to the 01 series of amendments to Regulation No. 6

Insert a new paragraph 2.2.6., to read:

- "2.2.6. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 5.6 of this Regulation."**

Insert a new paragraph 5.6., to read:

- "5.6. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate ,with a test report or other means acceptable to the Authority responsible for type approval, compliance with the**

requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 5, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A3. Proposal for Supplement 21 to the 02 series of amendments to Regulation No. 7

Insert a new paragraph 2.2.6., to read:

"2.2.6. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 5.11 of this Regulation."

Insert a new paragraph 5.11., to read:

"5.11. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall **annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate** ~~, with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2. "

Annex 5, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A4. Proposal for Supplement 19 to the original series of amendments to Regulation No. 23

Insert a new paragraph 2.2.4., to read:

"2.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 5.5 of this Regulation."

Insert a new paragraph 5.5., to read:

"5.5. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall **annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate**, ~~with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 4, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A5. Proposal for Supplement 16 to the original series of amendments to Regulation No. 38

Insert a new paragraph 2.2.4., to read:

"2.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 5.6 of this Regulation."

Insert a new paragraph 5.6., to read:

"5.6. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall **annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate**, ~~with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 4, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A6. Proposal for Supplement 16 to the original series of amendments to Regulation No. 50

Insert a new paragraph 3.2.4., to read:

"3.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 6.6 of this Regulation."

Insert a new paragraph 6.6., to read:

"6.6. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall **annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate, ~~with a test report or other means acceptable to the Authority responsible for type approval~~, compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."**

Paragraph 10., amend to read:

"10. CONFORMITY OF PRODUCTION

10.1. Every device bearing an approval mark as prescribed under this Regulation shall conform to the type approved and shall comply with the requirements of this Regulation. However, in the case of a device picked at random from series production, the requirements as to the respectively minimum and maximum intensities of the light emitted (measured with a standard filament lamp as referred to in paragraph 8 above) shall be at least 80 per cent of the minimum values specified and not exceed 120 per cent of the maximum values allowed.

10.2. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A7. Proposal for Supplement 15 to the original series of amendments to Regulation No. 77

Insert a new paragraph 3.2.4., to read:

"3.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 6.5 of this Regulation."

Insert a new paragraph 6.5., to read:

"6.5. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall ~~annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate ,with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 5, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A8. Proposal for Supplement 16 to the original series of amendments to Regulation No. 87

Insert a new paragraph 3.2.4., to read:

"3.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 6.6 of this Regulation."

Insert a new paragraph 6.6., to read:

"6.6. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall ~~annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate ,with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 5, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

A9. Proposal for Supplement 14 to the original series of amendments to Regulation No. 91

Insert a new paragraph 3.2.4., to read:

"3.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 6.5 of this Regulation."

Insert a new paragraph 6.5., to read:

"6.5. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall ~~annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate ,with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 5, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

~~This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."~~

A10. Proposal for Supplement 2 to the 01 series of amendments to Regulation No. 119

Insert a new paragraph 2.2.4., to read:

"2.2.4. In the case of a non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s): the documents according to paragraph 5.5 of this Regulation."

Insert a new paragraph 5.5., to read:

"5.5. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamp(s), the applicant shall ~~annex to the type approval documentation a certification produced by the light source manufacturer that demonstrate ,with a test report or other means acceptable to the Authority responsible for type approval,~~ compliance with the requirements as specified in paragraphs 2.11 and 4 of Publication IEC 60809, Amendment [6] to Edition 2."

Annex 5, insert a new paragraph 1.4., to read:

"1.4. In the case of non-replaceable filament lamp(s) or light source module(s) equipped with non-replaceable filament lamps, compliance, as specified in paragraph 4 of Publication IEC 60809, Amendment [6] to Edition 2, shall be

checked with lifetime requirements as specified in paragraph 2.11.2 and, in the case of colour coated filament lamps, with colour endurance requirements, as specified in paragraph 2.11.3. of Publication IEC 60809, Amendment [6] to Edition 2.

This compliance is responsibility of the light sources manufacturer(s) whose certification of conformity to the indicated requirements is included in the type approval documentation of the lamp."

II. Justification

The German document ECE/TRANS/WP29/GRE/2012/20, to which the present informal document is a proposal of modification, intend to ensure that the not replaceable and not approved filament light sources used in sealed devices and in (filament) light sources modules have a sufficient life time and fulfill colour endurance verification.

The main justification is the impossibility for the vehicle owner, in case of failure of one or more of these light sources, to replace them individually with the consequence that, in many occasions, vehicles are used on the roads for a relatively long time with lighting and light signaling devices not totally efficient, due to the relatively high cost of the complete lamp and the consequent reluctance of the owners to replace them for just one or two light sources failed.

In principle the idea has a logic background but Italy wish to point out some inconsistencies of the proposal:

- ECE Regulations are devoted to type approval of vehicles/devices/systems and should not dealing with circulation rules or PTI of vehicles in circulation. These items should be of competence of different bodies in UN-ECE and of the national/regional Authorities. Consequently requirements relating to the use of the vehicles and their components/systems should not be included in ECE Regulations.
- By definition the "light sources modules" are replaceable (as also indicated in paragraph 5.23 of ECE Regulation 48, where it is stated that they shall be replaceable when fitted in devices installed on the vehicles). Consequently the possibility to replace the modules (at a cost much lower than that of the complete lamp) exists and then the justification, relatively acceptable for the not replaceable filament light sources, is no more acceptable in this case.
- The not replaceable filament light sources are presently less used than in the past since for multiple light sources devices the manufacturers tend to use LEDs.

It sounds strange that, after more than ten years from the implementation of requirements for devices with multiple light sources and their introduction on the market, the problem of their failure is considered now that this technology is even less used. Please note that the requirements proposed by Germany could only be applied for new types of devices and probably they will became practically useless before to come into force.

However, in the case where a majority in GRE deems suitable to introduce such requirements in the various ECE Regulations, Italy request that the responsibility for the performances of the filament light sources be assigned to whom that, from technical and juridical point of view, has this responsibility, i.e. the light sources manufacturers.

The Italian proposal above has been prepared to this aim and Italy kindly requests to take it into account only in the case that GRE decides to accept the idea contained into the German proposal.

In this case, for the next GRE session Italy will also prepare a proposal to introduce suitable requirements on filament light sources life time into ECE Regulation 37 for the type approval of replaceable filament light sources.

Where the idea contained in the German proposal is accepted, Italy deems its future proposal for Reg. 37 justified as the present German one, considering that also approved replaceable filament light sources are allowed to be used as not replaceable and that the replacement of these light sources on the vehicles in use is, in practice, not so much faster that in the case of sealed lamps or light sources modules. Moreover replaceable approved filament light sources will be used for new projects for long time in the future, probably much more longer than the time in which the not replaceable filament light sources will disappear.
