# **Proposal for amendments to Regulation No. 46** (Devices for indirect vision)

The modifications to the current text of the Regulation are marked in bold or strikethrough characters.

## I. Proposal

Amend paragraph 6.1.1.2., to read:

### "6.1.1.2. (a) Exterior rear-view mirrors (Class II to VII)

The edge of the reflecting surface **must shall** be enclosed in a protective housing (holder, etc.) which, on its perimeter, **must shall** have a value "c" greater than or equal to 2.5 mm at all points and in all directions. If the reflecting surface projects beyond the protective housing, the radius of curvature "c" on the edge of the projecting part **must shall** be not less than 2.5 mm and the reflecting surface **must shall** return into the protective housing under a force of 50 N applied to the point of greatest projection, relative to the protective housing, in a horizontal direction, approximately parallel to the longitudinal median plane of the vehicle.

#### (b) Interior rear-view mirrors (Class I)

In the case the edge of the reflecting surface is enclosed in a protective housing (holder, etc.), the radius of curvature "c" on its perimeter shall be not less than 2.5 mm at all points and in all directions. In the case the edge of the reflecting surface projects beyond the protective housing, this requirement shall apply to the edge of the projecting part."

### **II.** Justification

The evolution of technology nowadays makes it possible a new generation of interior rearview mirrors having no housing or holder. This new design allows the mirror to be smaller in overall dimensions (i.e. in both width and height), leading to an improved forward Field of Vision (FOV), with no decrease in performance, while still maintaining the required rearward FOV. The current text of the Regulation No.46 unfortunately only allows for a mirror design that contains a housing (holder, etc.) which encloses the edge of the reflecting surface.

Compared to standard prisms and electro-chromatic glasses, the frameless mirror technology improves the overall glass strength and does not affect mirror reflectivity, and the lack of frame around the glass has no influence on the performance for the driver (the edge of a frameless mirror is rendered opaque by abrasion of the projecting part. Therefore only the plane mirror surface does reflect light).

Concerning the resistance to impact, the current text of the regulation requires that the mirrors fulfill the requirements of paragraph 6.1.3.3. when tested in accordance with the pendulum test described in paragraph 6.1.3.2.

The provision that the reflecting surface returns into the housing under a force of 50 N is not relevant for interior rear-view mirrors because they are designed such that the glass is fixed to the housing. This is the reason why it is proposed to divide the paragraph 6.1.1.2. into two sub-points, (a) for exterior rear-view mirrors (Class II to VII) and (b) interior rear-view mirrors (Class I).

