India's comments on proposals for a new UN Regulation on uniform provisions concerning the approval of road illumination devices (lamps) and systems for power-driven vehicles.

Document no ECE/TRANS/WP.29/GRE/2018/03.

The text reproduced below was prepared by the experts from India to propose changes in the regulation. This proposal is to take care of specific requirements taking reference from UN Regulation No 98, UN Regulation No 112 and UN Regulation No 113. India's proposals are marked in strikethrough for deletion of existing text and in *bold italic text in blue colour* for addition of new text.

A. PROPOSAL

A1) Paragraph 3.2.4.3.Table 1, amend to read:

3.2.4.3. The symbols identifying the road illumination function for which type approval has been granted.

Table 1: List of symbols/combinations (full list is provided in Annex 1 "Communication")

Lamp (function)	Symbol
Driving beam headlamp of Class A	R
Passing beam headlamp of Class A (asymmetrical)	С
Driving beam headlamp of Class B	HR
Passing beam headlamp of Class B (asymmetrical)	НС
Both Passing beam (asymmetrical) & Driving beam Class A	
Both Passing beam (asymmetrical) & Driving beam Class B	HCR
Driving beam headlamp of Class D (GDL)	DR
Passing beam headlamp of Class D (GDL asymmetrical)	DC
Both Passing beam(asymmetrical) and driving beam of Class D (GDL)	DCR
Adaptive Front lighting System (AFS): basic passing beam	XC
Adaptive Front lighting System (AFS): motorway passing beam	XCE
Adaptive Front lighting System (AFS): town passing beam	XCV
Adaptive Front lighting System (AFS): adverse weather passing beam	XCW
Adaptive Front lighting System (AFS): driving beam	XR
Passing beam headlamp of Class AS (symmetrical)	C-AS
Passing beam headlamp of Class BS (symmetrical)	C-BS
Passing beam headlamp of Class CS (symmetrical)	WC-CS
Passing beam headlamp of Class DS (symmetrical)	WC-DS
Passing beam headlamp of Class ES (GDL symmetrical)	WC-ES
Driving beam headlamp of Class BS	R-BS
Driving beam headlamp of Class CS	WR-CS
Driving beam headlamp of Class DS	WR-DS
Driving beam headlamp of Class ES (GDL)	WR-ES

Both Passing (symmetrical) and Driving beam Class BS	CR-BS
Both Passing (symmetrical) and Driving beam Class CS	
Both Passing (symmetrical) and Driving beam Class DS	WCR-DS
Both Passing (symmetrical) and Driving beam Class ES (GDL)	WCR-ES
Front fog lamp Class F3	F3
Cornering lamp	K

A2) Paragraph 4.5.2.4, amend to read:

4.5.2.4. The headlamp of class D and /or class ES (GDL) or Class D (GDL asymmetrical) or Class ES (GDL) or Class ES (GDL asymmetrical) and its ballast system or light source control gear shall not generate radiated or power line disturbances which causes a malfunction of other electric/electronic systems of the vehicle.

A3) Annex 2 paragraph 1.2.2.3., amend to read:

- 1.2.2.3. If the results of the test described above do not meet the requirements, the alignment of the headlamp may be changed, provided that the axis of the beam is not displaced laterally by more than 0.5 degree, to the right or left for and not by more than 0.2 degree up and down
 - (a) 1 degree, to the right or left for and not by more than 0.2 degree up and down for lamps identified with symbol 'C', 'HC', 'R', 'HR', 'CR' and 'HCR'.
 - (b) 0.5 degree, to the right or left for and not by more than 0.2 degree up and down for lamps identified with symbol 'DC', 'DR', 'DCR', 'C-AS', 'C-BS', 'W-CS', 'WC-ES', 'R-BS', 'WR-CS', 'WR-DS', 'WR-ES', 'CR-BS', 'WCR-CS', 'WCR-DS' and 'WCR-ES'.
- A3) Insert paragraph 1.2.1.3.1, in annex 2 after 1.2.1.3:
 - 1.2.1.3.1 If the results of the test described above do not meet the requirements, the alignment of the headlamp may be changed, provided that the axis of the beam is not displaced laterally by more than 1 degree, to the right or left for and not by more than 0.2 degree up and down

B. JUSTIFICATION

- B.1. RID has to cover all the headlamps and combinations covered by UN R 98, R 112 & R 113. It may be noted that these headlamp marked are already included in the reference paragraph 9.4.1 foot note 17. Relevant symbol are included for better clarity which are aligned to mentioned regulations in this paragraph.
- B.2. Requirement for paragraph 4.5.2.4 is applicable to all light source using Gas Discharge Light source. This is to align with UN R113.
- B.3. Text is proposed to align with UN R 98 (Supplement 09 to 01 Series), UN R112 (Supplement 08 to 01 Series) and UN R113 (02series). Proposal of headlamp aiming are

harmonized among these regulations to have clear understanding. Symbols of lamps are included to clearly differentiate on the aiming requirement w.r.t symbols.