

Subject: Proposal from Japan suggesting amendment to Regulation No. 19 in order to amend the requirements for the approval marks.

India's comments:

At the moment, Regulations Nos. 19 and 98 require that space of sufficient size shall be left on the lens and the main body for approval mark (However, if the lens cannot be detached from the main body, marking on the lens will be sufficient).

The Japanese proposal suggests that the marking on the lens shall be sufficient, if the lens cannot detach from the body or *if a lens of the same shape having different optical characteristics is not available.*

The second part of the proposal may create unnecessary confusion in approvals because the manufacturer may not be in a position to prove that similar lens doesn't exist or may not be developed later.

Hence, it is suggested that this proposal may not be accepted and the text of the Regulation may be retained as it is.
