**OICA's concerns about an automatic switching of the dipped beam headlamps
according to ECE/TRANS/WP.29/2007/20, produced by the European Community**

- A rather new and "non mature" technology such as an automatic switching of the dipped beam headlamps needs further development and broader application before being regulated.

- Automatic switching of the dipped beam headlamps could conflict with some current national use requirements.

- There is currently no definition of ambient light in UNECE Regulation No. 48. If automatic switching of the dipped beam headlamps was to be mandated, accurate definitions and appropriate limit values would be needed in order:
    - to calibrate the sensors,
    - to avoid differences of interpretations by the approval authorities.

- The technology of automatic switching of the dipped beam headlamps requires sensors that proceed from a rather new technology and needs validation to be applied in certain conditions. For example, such technology is still not available for certain categories of vehicle because it requires inclined windscreens. Trucks, busses and coaches with vertical windscreens would need front face re-design to fit this requirement. As a consequence, the regulatory requirements should be different according to the vehicle category.

- Sensor technology does not yet recognise daytime fog while it is mandated in many countries to switch on the dipped beam headlamps in case of fog.

- Automatic switching of dipped beam headlamps currently on the market are driver-helping systems and cannot properly be called safety devices.

- No safety data currently available indicate that automatic switching of the dipped beam headlamps could help improve the safety situation on the road. If such data ever exist, a cost/benefits analysis would be needed to indicate whether and under what conditions the equipment of such automatic switching of the dipped beam headlamps would be positive.

- Contradiction between mandatory fitment and the requirement that the driver shall have the possibility to override the function (see list of contradictions at the end of informal document GRE-57-17).

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