

Additional justification for document ECE/TRANS/WP29/2010/09

Following the WP29 decision to bring back ECE/TRANS/WP29/2010/09 to GRE for further consideration, the expert from France wants to give to GRE experts additional elements of justification for the introduction of new categories of end-outline marker lamps in Regulation n°7.

Document ECE/TRANS/WP29/2010/09 is the consolidation of two documents agreed during 62nd GRE session. The document related to the introduction of new categories of end-outline marker lamps is TRANS/WP29/GRE/2009/41.

This GRE document contains the following justification:

“B. *JUSTIFICATION*

This proposal aims at insuring consistency between Regulations Nos. 7 and 48 as regards end-outline marker lamps geometric visibility.

In the current text of Regulation No. 7, the end-outline marker lamp has to comply with the requirements of position lamps (cf. paragraph 5.3.). The geometric visibility requirements for position lamps in Regulation No. 7 are the following:

<i>Inside the vehicle:</i>	<i>45°</i>
<i>Outside the vehicle:</i>	<i>80°</i>

For installation on a vehicle according to Regulation No. 48, the requirements for end-outline marker lamps installed on a vehicle are:

<i>Inside the vehicle:</i>	<i>0°</i>
<i>Outside the vehicle:</i>	<i>80°</i>

The proposal introduces new categories of lamps in Regulation No. 7 (AM for front end-outline marker lamps, RM1 and RM2 for rear end-outline marker lamps), with a geometric visibility consistent with Regulation No. 48. However, the paragraph 5.3 will still allow the use lamps of categories A, R, R1 or R2 as end-outline marker lamps.

A combined proposal modifies Regulation No. 48 accordingly.”

In addition to this, the following elements should be considered:

- The requirement for the geometric visibility of 0° inwards for end-outline marker lamps has been present in Regulation n°48 since the entry into force of the original version, 1st January 1982, without any safety issue raised until now against this situation.

- The definition of an end-outline marker lamp according to Regulation n°48:

2.7.23. "**End-outline marker lamp**" means the lamp fitted near to the extreme outer edge and as close as possible to the top of the vehicle and intended to indicate clearly the vehicle's overall width. This lamp is intended, for certain vehicles and trailers, to complement the vehicle's front and rear position lamps by drawing particular attention to its bulk;

It is clear that the visibility to the inside of the vehicle is provided by position lamps, and not end-outline marker lamps.

- The paragraph 6.13.9 contains the possibility to group front and rear end-outline marker lamps in one device (e.g. campers, see picture hereunder):

“6.13.9. Other Requirements

Provided that all other requirements are met, the mandatory or optional lamps, visible from the front and the mandatory or optional lamps visible from the rear on the same side of the vehicle may be combined in one device.

(...)”



It is clear that in this case the 45° angle of visibility to the inside (imposed by ECE R7 approval as position lamp) is useless.

- It is also frequent that the front end-outline of a truck is installed on the side of the cab.



As for the preceding example, it is clear that in this case the 45° angle of visibility to the inside (imposed by ECE R7 approval as position lamp) is useless.

- The end-outline marker lamp is the only case of lamp in Regulation n°48 for which the visibility angles are more stringent at the time of lamp approval (ECE R7) than for installation on the vehicle (ECE R48).
