

India's comments on :

- (a) Doc. ECE /TRANS/WP.29/GRE/2017/9 : Draft new Regulation on uniform provisions concerning the approval of light-signalling devices (lamps) for power-driven vehicles and their trailers
- (b) Doc. ECE /TRANS/WP.29/GRE/2017/13 : Collective amendments to Regulations Nos. 3, 4, 6, 7, 19, 23, 27, 38, 50, 69, 70, 77, 87, 91, 98, 104, 112, 113, 119 and 123
- (c) Informal Document GRE-77-32 : Simplification of Lighting and Light - signalling Regulations

1.0 Doc. ECE /TRANS/WP.29/GRE/2017/9 : Draft new Regulation on uniform provisions concerning the approval of light-signalling devices (lamps) for power-driven vehicles and their trailers

1.1 Freedom to apply part of the Light-Signalling Devices (Lamps) by CP

In above document fourth paragraph in Introduction provides freedom to CP to apply part of LSD i.e. lamps, which is given as below:

“ It is expected that all Contracting Parties to the 1958 Agreement will adopt this UN Regulation and will provide detailed explanation in case they are not in a position to adopt particular lamps. These decisions will be registered in ECE/TRANS/WP.29/343 that records the status of the annexed Regulations and of the amendments.”

One of the example of special provisions in the UN regulations is that in UN Regulation 48: Revision 12 (Uniform provisions concerning the approval of vehicles with regard to the installation of lighting and light-signaling devices) special provision with respect to freedom to apply this regulation to certain vehicle categories is specified in paragraph 12. Transitional Provisions.

In view of this, the effectiveness of the proposed paragraph in the Introduction of new UN regulation on Light-Signaling Devices (LSD) need to be checked with WP.29 and UN secretariat considering following:

- The previous examples of special provisions are specified in Transitional Provisions (e.g. UN R 48)
- The previous examples are not included in document ECE/TRANS/WP.29/343.

1.2 Marking requirements

Paragraph 3.3.4 of document ECE /TRANS/WP.29/GRE/2017/9 provides option of using Unique Identifier or the approval marking similar to existing practice. India understands that the marking given in Table 2 of paragraph 3.3.2.4 means that when the series of amendments for a particular device is upgraded, the marking for that device will change from “Δ0” to “Δ1”.

Transmitted by the expert from the India

Informal document GRE -78 - # #
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2.0 Doc. ECE /TRANS/WP.29/GRE/2017/13 : Collective amendments to Regulations Nos. 3, 4, 6, 7, 19, 23, 27, 38, 50, 69, 70, 77, 87, 91, 98, 104, 112, 113, 119 and 123 and Informal document GRE-77-32 : Simplification of Lighting and Light - signalling Regulations

India in principle is in agreement to the approach and simplification of regulations that would be helpful to all stake holders in future. India understands that adoption of the three new regulations on viz. Light-signalling devices, Road illumination devices and Retro-reflective devices and transitional provisions in corresponding existing UN Regulations and freezing of the same will be done simultaneously as complete package in the GRE session and will be submitted to WP.29 for adoption simultaneously for the ease of operation of new regulations and existing regulations.
