GRE Informal Working Group „Simplification of Regulation"
Explanation of the "Change Index"

The "Change Index"
What is it and why do we need it?

Additionally:
Introduction of "Approval Numbering" and "Approval Marking"
applied to the new draft LSD, RID and RRD Device Regulations

GRE Informal Working Group „Simplification of Regulation"
Change Index – Document source

Document source for the introduction to „change index"

GRE/2018/16 + GRE-79-xx **GRE/2018/18 + GRE-79-xx**	Proposal for an amendment to Regulations Nos. 48, 53, 74 and 86 (Installation of lighting and light-signalling devices for different vehicle classes)
GRE/2018/02 + GRE-79-xx	Draft new UN Regulation on uniform provisions concerning the approval of light-signalling devices (lamps) for power-driven vehicles and their trailers
GRE/2018/03 + GRE-79-xx	Draft new UN Regulation on uniform provisions concerning the approval of road illumination devices (lamps) and systems for power-driven vehicles
GRE/2018/04 + GRE-79-xx	Draft new UN Regulation on uniform provisions concerning the approval of retro-reflective devices and markings for power-driven vehicles and their trailers
E/ECE/TRANS/505/Rev.3	Agreement concerning the Adoption of Harmonized Technical United Nations Regulations… (Revision 3)
WP.29/2017/107	Draft General Guidelines for United Nations regulatory procedures and transitional provisions in un Regulations

GRE Informal Working Group „Simplification of Regulation"
Change Index – Document source

Document source for the introduction to „change index"

GRE/2018/16 + GRE-79-xx

GRE/2018/18 + GRE-79-xx

These proposals provide the information about the definition and the usage of the „change index" for the Installation Regulations

GRE/2018/02 + GRE-79-xx

GRE/2018/03 + GRE-79-xx

These draft Regulations are using the „change index" and provide Transitional Provisions for the usage.

GRE/2018/04 + GRE-79-xx

E/ECE/TRANS/505/Rev.3

Revision 3 of the 1958 Agreement contains the information about approval marking & approval numbering for UN Regulations

WP.29/2017/107

These guidelines to Revision 3 provide help when dealing with Transitional Provisions.

GRE Informal Working Group „Simplification of Regulation"
Change Index - Problem statement

CURRENT SITUATION:	One Regulation = One Device (function). New series of amendments introduces higher stringency requirements to the device covered by the Regulation.
NEW SITUATION:	One Regulation covers many devices (functions). New series of amendments may introduce higher stringency requirements to only one or more of the devices (function) covered by the Regulation. However, according to the current system ALL devices covered by the Regulation need new type approvals following the new series of amendments.
TARGET:	Avoid unnecessary new type approvals for those devices (functions) for which a new series of amendments have not introduced higher stringency requirements.
SOLUTION:	Introduction of the „Change Index".

GRE-78 Question: What is the change index?

Paragraph 2.1.6. of Regulation No. 48 (Definition) (*see document GRE/2018/16*)

"2.1.6.   *"Change index" means a sequential number, starting from 0, specific to each lamp (function) covered by UN Regulations [LSD], [RID] and [RRD]. It indicates the number of times new series of amendments to the pertinent Regulation ([LSD], [RID] and [RRD]) have posed higher stringency requirements to this lamp (function)."*

Table 2 of the Draft Regulation on Light-Signalling devices (LSD) (*see document GRE/2018/02*)

Series of amendments to the Regulation	00	01	02
Function (Lamp)	Change Index for the specific function (lamp)		
Daytime running lamp	0	1	1
Front direction indicator lamp	0	0	1
Front direction indicator lamp (Vehicle category L)	0	0	0
Front end-outline marker lamp	0	0	0

The series of amendments IS part of the approval marking
The change index is NOT part of the approval marking

GRE Informal Working Group „Simplification of Regulation"
Approval marking

Type approval _marking_ *acc. to the new simplified Regulations*

Regulation No. 87
Revision 2 of the 1958 Agreement
Example of **approval marking**

Regulation No. (LSD)
Revision 3 of the 1958 Agreement
Requirement for **approval marking**

Symbol for DRL

RL

01   01 Series

Contracting party

E_4

1111   4 digit seq. number

RL   Symbol for DRL

E_4 Contracting party

[LSD]R01-1111

No. of Regulation   "R"   01 Series   4 digit seq. number
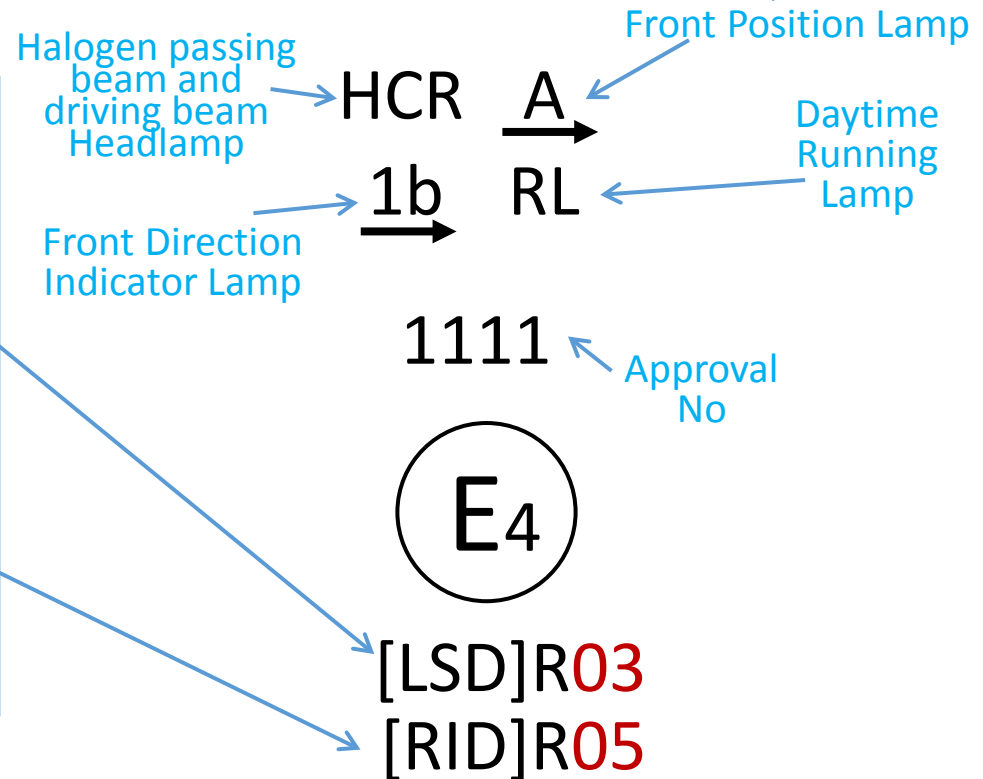
The change index is NOT part of the approval marking

Example of a group of lamps (functions)
type approved according to the LSD and RID Regulation

The change index is NOT part of the approval marking

This page has been added

Front Position Lamp

Halogen passing beam and driving beam Headlamp

Daytime Running Lamp

HCR   A

1b   RL

Front Direction Indicator Lamp

The DRL, Front Position Lamp and Front Direction Indicator Lamp are type approved according to the 03 series (for example) of amendments to the LSD Regulation

The Halogen Passing Beam and Driving Beam Headlamp is type approved according to the 05 series (for example) of amendments to the RID Regulation

1111

Approval No

E_4

[LSD]R03
[RID]R05

The approval marking always shows the latest series of amendments of the Regulation applicable to the type approval of the specific lamp (function).

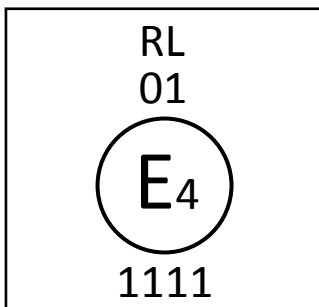# GRE Informal Working Group „Simplification of Regulation"
Approval numbering – Single Device (function) Type Approval

Type approval _number_ acc. to the Rev.3 of 1958 Agreement

Regulation No. 87
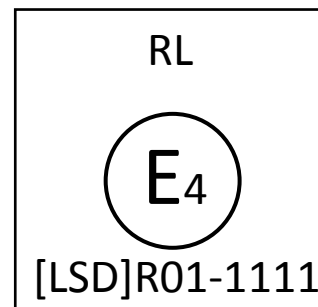Revision 2 of the 1958 Agreement
Example of **approval number**

RL
01

E_4

1111

E4*01*1111

- Contr. Party
- 01 Series
- 4 digit seq. number

Regulation No. (LSD)
Revision 3 of the 1958 Agreement
Requirement for **approval number**

RL

E_4

[LSD]R01-1111

E4*[LSD]R01/03*1111*00

- Contr. Party
- No. of Regulation
- "R"
- 01 Series
- Supp. No.
- 4 digit seq. number
- Ext. No.

The change index is NOT part of the approval numbering

The changes to the approval numbering follow the provisions of the 1958 Agreement, Schedule 4, Par. 3 (E/ECE/TRANS/505/Rev.3)

What is the „change index" needed for? - Device

Adding a paragraph 6.1.1. under subsection „Transitional Provisions" in all three new draft Device Regulations (LSD, RRD, RID), see document GRE-79-10:

(Source: „Draft General Guidelines for United Nations regulatory procedures and transitional provisions in UN Regulations" WP.29/2017/107, Section 41.)

"6.1.1.   *Contracting Parties applying this UN Regulation shall continue to accept UN type-approvals of the lamps (functions), to any of the preceding series of amendments to this UN Regulation, which are not affected by the changes introduced by the latest series of amendments.*

To verify this, the change index applicable to the pertinent lamp (function) shall not differ from its change index as indicated in the latest series of amendments.

Series of amendments to the Regulation	00	01	
Function (Lamp)	Change Index for the specific function (lamp)		
Daytime running lamp	0	1	
Front direction indicator lamp	0	0	
Front direction indicator lamp (Vehicle category L)	0	0	
Front end-outline marker lamp	0	0	

Daytime running lamp:
The change index differs
-> par. 6.1.1. is **NOT** valid for this function

Front direction indicator lamp:
The change index does not differ
-> par. 6.1.1. **IS** valid for this function

GRE Informal Working Group „Simplification of Regulation"
Change Index – Usage

Adding a general requirement in Installation Regulations Nos. 48, 53, 74 and 86 (GRE/2018/16, ../18 and GRE-79-11)

"5.32.   *A device type approved according to any preceding series of amendments to UN Regulations [LSD, RID and /or RRD] is deemed equivalent to one approved according to the latest series of amendments to the pertinent Regulation ([LSD], [RID] and [RRD]), when the change indexes (defined in paragraph 2.1.6.) related to each individual lamp (function) do not differ. In this case such a device may be fitted on the vehicle to be type approved without any update of the device type approval documents and device markings"*

(example for UN Regulation No. 48)

1a

E₄

[LSD]R**00**-3456

Even if the **01 series of amendments** to Regulation No. [LSD] entered into force and the transitional period has expired, the device on the left side may be used for new vehicles because the change index for this function (front direction indicator), i.e „**0**" did not change between series **00** and **01**

Series of amendments to the Regulation	00	*01*	
Function (Lamp)	Change Index for the specific function (lamp)		
Daytime running lamp	0	1	
Front direction indicator lamp	0	0	

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Change Index – Conclusions

- The „change index" is merely a tool (an indicator) to support type approvals and the usage of type approved devices

- The concept of „change index" is in line with Revision 3 of the 1958 Agreement and supported by the guidelines (accepted by WP.29 in November 2017)

- The „change index" is not part of the approval marking nor of the approval numbering