

OICA Comments on GRE-69-15-Rev.1

GRE candidate items for IWVTA

Comments:

1. Regulation No. 48 has to be discussed as a priority and the complete structure should be reviewed, before tackling the component Regulations to create the complete package for IWVTA.
 2. The following Regulations should be deleted from the list of Candidate items for IWVTA, since they are obsolete and superseded by other Regulations: Regulations Nos. 1, 2, 5, 8, 20 and 31.
 3. Regulation No. 128 on LED should be added to the list.
 4. Regulation No. 27 (advance warning triangle) should be deleted from the list, since it is a component approval which has not to be considered under IWVTA.
 5. Item No. 54 "Headlamps" contains also Regulation Nos. 37, 99 and 128. However, filament lamps (Regulation No. 37), HID lamps (Regulation No. 99) and LED's (Regulation No. 128) are being used not only in headlamps but these light sources are also installed in direction indicators, DRL, stop lamps etc. Therefore the light sources should be listed under a separate item, named "light sources".
 6. There is no need for a "sponsor" for each and every UN Regulation listed under the candidate items, when there is no need to sponsor an amendment.
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