

Upon reviewing among the JASIC member; the followings are Japanese comments on the AFS draft.

1) AFS mounting height (Paragraph 6.20.4.1.1 of R48)

In the latest draft, the maximum mounting height of AFS (Dimension G) is 1500 mm, but it is too much higher and glare condition is very dangerous for on-coming driver. The dimension G should be reduced to 950 mm because the value of 950 mm is being proposed for the passing-beam headlamp height in the GTR draft.

2) Dipped-beam leveling conditions (Paragraph 6.20.6.1.3.b of R48)

6.20.6.1.3(b) a combined light output of [650] lumen within the boundary of the 0.5 lx isolux area.  
At the end of this paragraph, some words in red *Italian* letters should be added in order to clarify the same meaning as Paragraph 6.5.6.2(b) of R.XXX.

3) AFS operation switch (Paragraph 6.20.7.3 of R48)

This paragraph does not necessarily require the AFS operation (ON/OFF) switch. Other than AFS operation switch, if we have some means that can set the AFS to its neutral state, it is enough for compliance with this paragraph, we understand. Is our understanding correct?

4) E-mode conditions (Paragraph 6.20.7.4.3 of R48)

Again, Japan would like to insist on the vehicle speed of 80 km/h, with the following reason;  
It is afraid that the indirect glare to the preceding vehicle through the rear view mirrors becomes problematic because in the E-mode, the cut-off is 0.34° farther upwards than normal and the distance between vehicles becomes shorter as the speed is reduced down to the lower speed limit. Accordingly, the lower speed limit should be elevated so that there will be no operation of E-mode at speeds resulting in short distances between vehicles.

5) Motorway conditions (Paragraph 6.20.7.4.3 of R48)

The Vienna Convention is quoted by Footnote 8. Taking some motorway conditions and constructions in various countries (including Japan) into consideration, however, it is not enough as a motorway condition. Therefore, we would like to add the following condition;  
either

- a) However, the definition of motorway may be defined by each contracting party
- or
- b) The maximum speed limit of the motorway is 80 km/h or more

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