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1998 AGREEMENT – GTR ON LIGHTING INSTALLATION

UK comments

Transmitted by the expert from the United Kingdom

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Department for Transport  
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## **GTR comments**

### **A. Philosophical comments**

1. It is still not obvious how the GTR will fit in with other Regulations. However it is clear from the text of the 1998 Global Agreement that reciprocal recognition is not obligatory. Acceptance of a GTR by AC3, simply means that the GTR is accepted into the Global Registry of Regulations. Each Contracting party (or REIO) then has to decide whether or not to implement the GTR into national regulations.

In the case of the UK, it is a member of a REIO (the European Community) and technical regulations for new vehicles are agreed at the REIO level, not at national level. Once the GTR is agreed, the REIO will face the decision of whether or not to accept the GTR, and whether or not to mandate it.

At the moment the UK is proceeding on the assumption that the GTR will be accepted by the EU and will not be mandatory but will be an optional alternative to other lighting installation requirements in the REIO which the UK is a member of. Type approval will take place to a Directive on Lighting which will incorporate the GTR plus other provisions which the GTR leaves to Contracting Parties.

2. Will it be possible to obtain type approval to a GTR ? If this is the case it will be a complex exercise. The manufacturer will have to submit reams of documentation to the approval authority, covering every lamp fitted to the vehicle in every territory. There will have to be separate "versions" or "variants" of the vehicle for each Contracting Party – US, Japan, EC and others. The authority will need to check that with all possible lamp combinations appropriate for the particular CP in which the vehicle might be sold, the vehicle still meets all applicable requirements.

It seems more sensible for the GTR to exist as a kind of overlay. As an example imagine the hypothetical GTR as a 10 page document. In the USA the lighting regulation is 15 pages long, and the first 10 pages consist of the GTR, with 5 pages of unique US requirements. In Europe the lighting regulations might be 16 pages long, again with the first 10 pages consisting of the GTR. Likewise perhaps in Japan their regulations may be 14 pages long, with the first 10 pages being the GTR. The GTR could be a base which national law builds on. A type approval is issued in Europe if the vehicle conforms to the 16 pages of lighting regulation but no separate approval is issued for GTR.

3. In principle we can accept a general philosophy that the GTR be of equal stringency to the most stringent of existing requirements. Therefore if Identification Lamps are mandatory in North America they could be mandatory in the GTR. The GTR itself would be optional so for a manufacturer not selling in North America, he could still produce a vehicle without ID lamps that conforms to national requirements in the countries where the vehicle is sold.

## B. Technical comments

3.2.6, 3.2.7 The introduction of a "failure tell-tale" is necessary because we have inconsistency in the Regulation. (This new definition is certainly not meant to lead to additional requirements for tell-tales that are not requested today!).

An example - 5.7.8 covers tell-tale for stop lamp. The current phrase "operating tell-tale ... which comes ON in the event of malfunctioning of the stop lamps" is nonsense. An operating tell-tale, by definition, is lit when the lamp is working and goes OFF in the event of malfunction. Hence the need for a new definition. The "operating tell tale" should only apply for lamps where the driver needs to be told that they are on: Direction Indicators.

3.2.13 Definition of Light Duty and Heavy duty vehicle seems a laborious way of solving a simple problem. Instead for each lamp the characteristics of the vehicles which need it shall be listed. EOML – criteria is width, SML – criteria is length – irrespective of other criteria. See also 5.7.2 below.

4.1 We can agree to the Italian proposal in their Informal document.

4.11.2 We see no scope for misinterpretation of the text here and so do not support the Italian proposal to define "flash to pass" function. The meaning of headlamp flashing varies from country to country so we cannot talk about what it is used for.

4.11.3 Is a definition of steady burning required ? In our opinion it is not necessary at present. Steady burning means that no modulation is permitted. (We understand that LEDs do modulate but this is not normally visible to the naked eye. In the future it may be necessary to agree an objective standard as to the level of modulation which is not visible to the naked eye).

4.20 (Temporary substitution of lamps for failed ones) We would prefer to revert to the original R48 text. Any changes to the substance of this can be discussed in detail later on.

5.1.7.2, 5.1.7.3. We disagree and propose reversion to R48 text. Why can four driving beams not be switched on simultaneously?

5.1.7.5 Like Italy, we strongly disagree to automatic operation of driving beam. This is not permitted currently in R48 and needs more discussion for which there is not time during GTR negotiations. If automatic switching off for the driving beam is allowed, users will become accustomed to this and will forget to do it when they see a cyclist or pedestrian. This could lead to safety problems. The driver must retain full control over the vehicle and not be encouraged to be lazy. In the US the strong litigation culture will help to stop manufacturers offering these systems (as they allow the driver to fall into bad habits) but in Europe we do not want to allow them at all. The GTR should be the most stringent requirement - and this is to not permit automatic operation.

5.2.6 We need to say that (1) the initial aim must comply to CP requirements and (2) the vehicle must have the capability to remain within the correct aim when fully loaded, whether by manual or automatic means. Italy have moved the second statement to 5.2.9 which could be a solution.

5.3.7.3 We strongly support this – front fog lamps must not be automatically operated. We are not aware of fog sensors being available so would be adamantly opposed to automatic operation of fog lamps at this stage. In the UK, the greatest number of lighting complaints the Minister gets (after headlamp glare, but ahead of DRL) is misuse of front fog lamps so we would like to consider how to prevent this. We would first like to consider introduction of automatic front fog lamp OFF. Later on, if that is satisfactory the possibility of the front fog lamp being turned on could be considered. The choice of what lighting is safest must be a decision for the driver as he alone can see what is needed. How on earth can the vehicle decide whether or not front fog lamps are necessary?

With modern Xenon headlamps in particular that offer a wide spread of light, there is a suspicion that the front fog lamps are a fashion accessory.

Also there are some countries where fog lamps and headlamps are not permitted simultaneously and so automatic operation of fog lamps would place this in jeopardy. We cannot have type approval overriding national use laws.

5.4.4.2 prefer to keep a height requirement for reversing lamps. It is easier to enforce than visibility.

5.7.2 For the requirement for a third stop lamp we are not fussy. We know that it is possible to fit a third (S3) stop lamp to pick-ups as we have seen these vehicles on the road. It could be fitted at the top of the rear tailgate or at the top of the rear window on the cab. So we could accept a cut-off on the basis of GVM of 3500kg or 4500kg, and on the basis of width or length.

5.7.4.2 The third stop lamp should be high mounted and should not be below the rear window – except on a convertible. It would preferably be at the top of the rear window.

5.7.7 Follow GRRF discussion on stop lamp activation.

5.7.8 For the stop lamp it is a "failure tell-tale", not "operational tell-tale".

5.11.7.5 We are not aware of fog detectors so not in favour of automatic operation of rear fog lamp. Although (assuming that mature technology exists) there is more justification for this than there is for automatic operation of front fog lamps.

5.12 Why do we keep reference to Parking lamps ? Surely this is just a switching arrangement of the Position lamps. No modern vehicle has only 2 parking lamps, one on each side of the vehicle ?

5.18.2 We can agree to the Italian suggestion that Side Marker Lamps are not mandatory. We would also like to ask if they could be white – only for those front SML that are combined or reciprocally incorporated with front position lamp.

5.19.7 Why the change to mention a "specified time or distance" ?

DRL should turn off when position lamps (and not headlamps) are switched on.

5.21.9.1 Cornering lamp: Prefer 100mm distance to DI.

5.22 Conspicuity treatment needs to cater for "one colour" European design – red to rear and yellow to side.