

1) General comments

1) Japan believes that the concept of GTR should lie where "a higher level of requirements shall be stipulated, while individual requirements may be described only if unification can not be achieved."

2) Japan would like to welcome the 2001/6/rev.3 because its equipment requirements for lamps (mandatory or voluntary) are almost harmonized as compared to 2001/6/rev.2. GTRs are achieving the purpose of establishment.

However, no color requirements for lamps are described although the Contracting Parties set up their regulations.

If there is no way to allow color requirements to be described in the GTR, with which Japan does not agree, the reasons should be explained at WP29 for approval.

For example, a note should be attached stating, "Nothing in this GTR shall preclude the Contracting Parties applying this Regulation from allowing red rear direction indicator lamps to be used in their territories." Then para.4 should include their detailed requirements.

Otherwise, at least a text stating, "The color requirements stipulated by the Contracting Parties shall apply respectively." should be added in para.4.

3) If GTRs handle vehicles 3.5 tons or over in GVW, and the requirement of conspicuity treatment in para.5.22 is added, more requirements related to ECE R104 (retro-reflective markings) should be added. Although the rear marking plate in ECE R70 is excluded by the requirements in para.3.5.14 of 2001/6/rev.3, it is mandatory equipment both in European countries and Japan. Therefore it is advisable that the rear marking plate be added in GTRs. Japan understands that ECE R48 excludes the equipment requirement of rear marking plates because there exists a wide range of variations in equipment requirements among the Parties. The rear marking plate equivalent to that of ECE R70, for example in Japan, is mandatory in road vehicles of category 2 and their trailers 7 tons or over in GVW.

However, if the large difference among the Parties prevents the requirement of GTRs from being specified, it would be an idea to modify the text of para.3.5.14.3 so as to exclude the conspicuity treatment and retro-reflective marking.

4) As discussed when preparing for the draft of GTR0, it is rather unreasonable to harmonize more detailed classifications of vehicle categories such as in para.3.2.13 ("Light-duty vehicle") than that of GTR0, which Japan does not consider necessary. It would be sufficient to specify the applicable vehicles in individual requirements for lamps.

2) GTR Specific comments

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Para1	Scope: Delete of color requirement	GTRs should include color requirements. We cannot understand precisely why they cannot be added. If it is decided that the color requirements are not to be specified, a text stating, "The Contracting Parties shall apply respectively their own color requirements of applicable regulations stipulated by each Party" should be added in para.4.	

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Para3.2.13	"Light-duty vehicle" means passenger car, utility vehicle or light commercial vehicle not exceeding 6,000 mm in length , 2,032 mm in width , or [5,500] kilograms in gross vehicle weight.	1) Japan does not consider this definition necessary because they are not included even in GTR0. It would be sufficient to specify the applicable vehicles in individual requirements for lamps.	
Para3.2.14	"Heavy-duty vehicle" means on-road vehicles equal to or exceeding 6,000 mm in length , 2,032 mm in width , or 5,500 kilograms in gross vehicle weight.	2) If they are to be described, the definitions of light-duty vehicles and heavy-duty vehicles need to be studied carefully, because there exist vehicles exceeding 6,000 mm in length. With regard to GVW, classification by 5.5 tons is considered technically impractical. 3) If they are to be described, the terms "length" and "width" should be replaced by "structural length" and "structural width" as given in GTR0 respectively.	
Para3.3.17	Single lamp, Two lamps	In practice, it is left for individual Parties to stipulate their definition; however, the requirements in paragraphs 2.16 and 5.7.2 of Doc. WP29/2004/4, which was recognized in the 132nd session of WP29, should be added. Para.4.8.1 also needs to be corrected.	
Para4.8.1	Grouped, combined or reciprocally incorporated lamp	The contents of para.5.7.1 of Doc. WP29/2004/4 should be added.	
Para4.9.2	In width "E" – the maximum distance of the lamp from the adjacent extreme outer edge of the vehicle shall be measured from that edge of the apparent surface in the direction of the reference axis which is the furthest from the median longitudinal plane of the vehicle.	The definition of the extreme outer edge should be added to para.3. This definition shall conform to para.2.14 of ECE R48.	

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Para4.9.3	In length "K"-the maximum distanceof the vehicle's overall length (front-end or rear-end of the vehicle) shall be	Not the term "overall length" but "structural length" is considered correct.	
Para5.5.4.3		The term "overall length" in para.5.5.4.3 also needs to be corrected.	
Para4.10	Visibility of light other than white to the front of a vehicle and of light other than red to the rear of a vehicle	The requirement in para.4.10 should be replaced by the following: Visibility of red light to the front of a vehicle and of white light to the rear of a vehicle. The same applies to para.4.10.1 and para.4.10.2.	
Para4.10.2	For the visibility of light other than red towards the rear of a vehicle, with the exception of a reversing lamp, cornering lamp and direction indicator lamp, there must be no direct visibility of the apparent surface of a lamp capable of projecting or retro-reflecting light other than red if viewed by an observer moving within Zone 2 as specified in annex 2.	WRT para.4.10.2: The reflection of white light of rear lamps can occur in lamps combining a white lens and an LED light and the like. We hope to discuss this item at the 53rd session of GRE. Our current viewpoint: There is no mistaking the rear RR for the front lighting of the vehicle because the reflections from rear RRs are much higher. Even if the rear RRs are stained and their reflections are lower, there is no mistaking the reflection for headlamps.	
Para5.1.7.1	The driving beam headlamps may be switched on only when the master light control is in the "headlamps-on" position except when they are used to provide light signals consisting of intermittent illumination at short intervals.	1) This paragraph should be deleted. For a vehicle with an automatic light control system installed, by which the lights turn on automatically when it gets dark, if the switching lever of the beam is on the driving beam position with the system on, the driving beam headlamps are switched on automatically. This system has been adopted in many Japanese automobiles for more than 20 years along with the high beam tell-tale indicator required. Because there have	

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		<p>been no complaints about the system, it should be approved.</p> <p>2) In order for the above system to be made clear, the following shall be added. The same applies to paragraphs 5.2.7.4 and 5.2.7.5.</p> <ul style="list-style-type: none"> * Driving-beam headlamps may be switched on or off automatically. * It shall always be possible to switch the driving-beam headlamps function on and off manually. 	
Para5.1.7.5	5.1.7. Electrical connections Automatic switching from driving beam to passing beam mode is allowed.	<p>Japan cannot agree to automatic switching since it can be extremely dangerous.</p> <p>The following items should be verified:</p> <p>Only when there are no vehicles and also bicycles around, the automatic switching shall be available.</p> <p>1) Can bicycles be detected?</p> <p>2) How wide should the range of detecting oncoming forward vehicles be?</p> <p>2-1) Lateral detecting range: Detect oncoming vehicles in small corners.</p> <p>2-2) Vertical detecting range; Detect oncoming vehicles on undulating roads.</p>	
Para5.2.6.3	Each Contracting Party may prescribe specific provisions regarding manual or automatic levelling devices for passing beam headlamps.	In accordance with the requirements of R48, the manual or automatic leveling devices should be mandatory if a vehicle indicates upward inclination in the loading condition more than specified.	
Para5.3.7.3	The front fog lamps shall not be automatically operated.	Japan can accept this automatic lighting system because it is technically easier than the detecting system for automatic	

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		switching from driving mode to passing mode specified in para.5.1.7.5. It is not reasonable not to approve the automatic operation of the front fog lamps while that of the rear ones is approved in para.5.11.7.5.	
Para5.5.2	<p>5.5 direction indicator Number Motor vehicle: 2 front direction indicator lamps 2 rear direction indicator lamps 2 optional rear direction indicator lamps 2 side direction indicator lamps 2 middle-side direction indicators on vehicles exceeding 9 m in length.</p> <p>Trailer: 2 side direction indicator lamps for trailers of 6,000 mm or more in overall length,</p>	<p>1) The requirement for “middle-side direction indicators on vehicles” for motor vehicles should be replaced by the one stipulating “vehicles of category 2 of 8 tons or more in gross vehicle weight shall be equipped with middle-side direction indicators.”</p> <p>This must be based on Japanese regulations, which applies to GVW of 8 tons or more. This is because there have been accidents involving pedestrians when heavy vehicles make a quick left turn, whereas long vehicles cannot make a quick turn easily, resulting in relatively fewer accidents.</p> <p>2) ECE R48 does not require trailers to be equipped with side direction indicators. Therefore the item “trailer” should be deleted. In Japan, meanwhile, middle-side direction indicators are mandatory. Hence, the following requirement should be added.</p> <p>Trailer: 2 middle-side direction indicators on trailers of 8 tons or more in gross vehicle weight.</p>	
Para5.5.3.2.	If the distance between the edge of the apparent surface in the direction of the	Discussed in the 52nd session of GRE. To stipulate the distance to the	

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	reference axis or the optical centre of the direction indicator lamp and that of the apparent surface in the direction of the reference axis of the passing-beam headlamp and/or the front fog lamp is less than respectively 40 mm or 100 mm the photometric output of the direction indicator must be increased according to the regulation of a Contracting Party.	<p>passing-beam headlamp, the edge of the apparent surface of the front direction indicator lamps should be limited to the edge of the light-emitting surface.</p> <p>The stipulation of para.3.3.13 has options either of the light-emitting surface or the boundary of the illuminating surface. If the former is chosen, the intensity of the front direction indicator lamps must be increased. Meanwhile, if the latter is chosen, it will lead to lower visibility of the front direction indicator lamps.</p> <p>Japan hopes to discuss this in the next GRE.</p>	
Para5.5.4.3.	<p>In length Side direction indicator lamps on motor vehicles: K less or equal to the lesser of 2,500 mm, or half of the vehicle's overall length, measured from the front of the vehicle.</p> <p>Side direction indicator lamps on trailers: the side direction indicator lamp shall be in the middle third of the vehicle</p> <p>Middle-side direction indicator lamps:</p>	<p>1) The term "overall length" should be replaced by the term "structural length."</p> <p>2) The requirements in ECE R48 do not require the trailer to be equipped with side direction indicator lamps. Therefore, Japan wishes this requirement to be deleted.</p> <p>3) The position of the middle-side direction indicator lamps is not stipulated. The following should be added based on the Japanese regulations.</p> <p>Middle-side direction indicator lamps on motor vehicles: Within 2,500 mm from the cab's rear end.</p> <p>Middle-side direction indicator lamps on trailers: Within 4,500 mm from the front end.</p>	

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Para5.5.5.1.	Horizontal angles: middle-side direction indicators	<p>The geometric visibility in middle-side direction indicators is not stipulated. The following should be added.</p> <p>The middle-side direction indicator shall be visible from any point on the vertical plane 1,000 mm outwards of the vehicle's outermost point and parallel to the median longitudinal plane of the vehicle, and between a height of 1,000 mm and 1,600 mm from the ground and between the vertical line 1,000 mm forward to the installation position of the middle-side direction indicator and the other vertical line equidistant with the vehicle's rear end from the installation position of the middle-side direction indicator (see Figure 1).</p>	
Para5.5.5.2.	Vertical angles: side direction indicator lamps α_1 equal to 30° α_2 equal to 5°	<p>1) This differs from the stipulation of ECE R48 (Category 5: +/- 15°, Category 6: +/- 30°); however, Japan does not object to this proposal.</p> <p>2) The geometric visibility in middle-side direction indicators is not stipulated. The following should be added.</p> <p>Middle-side direction indicator lamps shall be visible from any point on the vertical plane 1000 mm outwards of the vehicle's outermost point and parallel to the median longitudinal plane of the vehicle, and between a height of 1,000 mm and 1,600 mm from the ground and between the vertical line 1,000 mm forward to the</p>	

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		installation position of the middle-side direction indicator and the other vertical line equidistant with the vehicle's rear end from the installation position of the middle-side direction indicator (see Figure 1).	
Para5.5.5.3.	<p>For the direction indicator to be considered visible throughout the angles of geometric visibility one of the following shall be met:</p> <p>The minimum luminous intensity within the above angles must not be less than 0.3 cd;</p> <p>or</p> <p>Throughout the angles of geometric visibility, with the outward angle up to 45°, the lamp must provide an unobstructed view of the apparent surface of at least 12.5 cm², except for the side direction indicator for which the minimum area is 10 cm². The apparent surface of any retro-reflector shall be excluded.</p>	<p>The requirements for the middle-side direction indicators are missing. The following should be added.</p> <p>“however, that for the middle-side direction indicators must not be less than 3cd.”</p> <p>“and except for the middle-side direction indicators for which the minimum area is 40 cm².”</p>	
Para 5.7.2	<p>5.7 Stop lamp</p> <p>Number</p> <p>light-duty vehicles: 3</p>	<p>1) It is not appropriate to require LDVs to have high-mount stop lamps to be installed. This is because motor vehicles exceeding 6,000 mm in length may be excluded.</p> <p>Japan hopes this requirement shall apply to motor vehicles not exceeding GVW 3.5 tons except for chassis-cab vehicles.</p> <p>However, Japan does not object to the</p>	

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		<p>additional revision stating that it shall apply to motor vehicles not exceeding GVW 4.5 tons except for chassis-cab vehicles.</p> <p>Japan, meanwhile, objects to the classification by GVW of 5.5 tons because there is presently no requirement even in MVSS.</p> <p>2) However, at the 50th Session of GRE, the conclusion was that “with regard to the mandatory installation of high-mount stop lamps, it is difficult for pickup trucks to be included in connection with the road traffic laws of European countries (stipulating that the lamps shall not be covered by a load).” Unless chassis-cab and open cargo vehicles are excluded, there seems to be no room for compromise. Japan can make only one proposal as follows, although it may not be a good idea.</p> <p>* The scope of this proposed GTR may be limited to category 1 vehicles of passengers of 9 or less and vehicles not exceeding 4.5 tons in GVW except for chassis-cab and open cargo vehicles.</p>	

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Para 5.7.3	<p>Arrangement All vehicles: one pair of stop lamps</p> <p>light-duty vehicles (optional on other vehicles): In addition to the pair of stop lamps, one centre stop lamp mounted on the centerline of the vehicle. Only, when the median longitudinal plane of the vehicle is not located on a fixed body panel but separates one or two movable parts of the vehicle (e.g. doors), and lacks sufficient space to install a single centre stop lamp on the median longitudinal plane above or below such movable parts, either: Centre stop lamp composed of two devices may be installed, one on each movable part, or one centre stop lamp may be installed offset to the left or to the right of the median longitudinal plane.</p> <p>In addition on other motor vehicles and trailers: one optional pair of stop lamps may be installed if centre stop lamp is not installed.</p>	<p>This requirement needs to be revised without using the definition of LDV. (The same as above mentioned.)</p> <p>In accordance with ECE R48, the installation of an additional pair of stop lamps in vehicles equivalent to M1 and N1 categories needs to be prohibited.</p> <p>Even if the results discussed in para.5.7.2 may be affected, in accordance with ECE R48 the installation in vehicles of category 1 vehicles of passengers of 9 or less and not exceeding 3.5 tons in GVW should be prohibited.</p>	
Para 5.7.4.2 Para 5.9.4.2 Para 5.10.4.2	<p>In height H2 more or equal to 350 mm (380 mm to the optical centre of the lamp)</p>	<p>Japan does not object to the proposed height for stop/tail lamps and side-marker lamps in spite of the requirements set by the U.S. Center for Optics.</p>	

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Para 5.7.7.1	<p>Electrical connections</p> <p>All stop lamps must light up simultaneously when either the service brake or endurance brake (e.g. retarder) is activated and when a complete or partial braking system is activated for the purpose of generating vehicle speed retardation with or without a direct action of the driver. They must switch off automatically once the above conditions ceased to exist.</p>	<p>The switching-on conditions of the stop lamp need to be replaced by the conditions agreed upon at the 55th session of GRRF (TRANS/WP29/2004/38).</p> <p>The flashing/automatic lighting of stop lamps in case the emergency brake is applied will be added after the discussion in GRE is finalized.</p>	
Para 5.9.1	<p>5.9 Fr position lamp <u>Presence</u></p> <p>Mandatory on all motor vehicles.</p> <p>Mandatory on trailers over 1,600 mm wide</p> <p>Optional on trailers, which are not more than 1,600 mm wide.</p>	<p>In Japan the front position lamps are mandatory for all trailers.</p> <p>Japan will accept the mandatory level limited to trailers of 1,500 mm wide or over.</p> <p>However, we object to the classification limit of 1,600 mm wide.</p>	
Para 5.9.4.1 ,5.10.4.1 ,5.14.4.1 ,5.15.4.1 ,5.16.4.1	<p>5.9 Fr position lamp <u>In width:</u> as close as practicable to the adjacent extreme edge of the vehicle while: E less or equal to 400 mm [this condition shall not apply to the optional rear position lamps]</p>	<p>1) The meaning of this description is too vague. Japan proposes that it be replaced by the description below in para.5.13.4.1. (The same applies to paragraphs 5.14.4.1, 5.15.4.1, and 5.16.4.1.)</p> <p>The wording (copied below) in para.5.13.4.1 is acceptable. as close as possible to the adjacent extreme outer edge of the vehicle. This condition is deemed to have been met when: Motor vehicles: E less or equal to 400 mm</p>	

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Para 5.9.5.1	5.9 Fr position lamp H angles $\beta 1$ equal to 45° $\beta 2$ equal to 45°	This requirement should be consistent with ECE R48. For trailers the angle of $\beta 2$ should be mitigated to 5°.	
Para 5.9.7. para5.10.7 <input type="checkbox"/> 5.13.7 <input type="checkbox"/> 5.18.7	<u>Electrical connections</u> Front position lamps may be switched on and off manually or automatically in accordance with paragraph 4.11.	Japan has adopted the automatic lighting system for the past 20 years, which should be added as proposed. (The same applies to paragraphs 5.10.7, 5.13.7, and 5.18.7.)	
Para 5.10.2	5.10 Rear position lamp Number Two. [Two optional. See 5.10.4.2.]	In accordance with ECE R48, revision should be made so that an optional pair of rear position lamps shall be allowed except only for vehicles equivalent to M1 and N1 categories. More specifically, in accordance ECE R48, the installation in vehicles in category 1 of passengers of 9 or less and not exceeding 3.5 tons in GVW should be prohibited.	
Para 5.12.1	PARKING LAMP <u>Presence</u> On light duty vehicles - optional. On all other vehicles, prohibited.	In accordance with ECE R48, revision should be made as follows: on motor vehicles of 6,000 mm or less in structural length, and 2,000 mm or less in structural width – optional. (Vehicle GVW should be irrelevant.)	
Para5.13. Para5.13.1.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> OUTLINE <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Presence On heavy duty vehicle – mandatory On chassis-cabs and vehicles between 1.80 and 2.10 m in overall width – optional	In consideration of the purpose of these lamps, this mandatory requirement should apply only to vehicles of 2,100 mm or more in overall width. (The GVW and overall length should be irrelevant.) Ref/ R48 para.3.5.13. <u>"End-outline marker lamp (clearance lamp)"</u> means a lamp fitted near to the extreme outer edge and as close as possible to the top	

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		of the vehicle and used to indicate clearly the vehicle's overall width . This lamp is intended, for certain vehicles and trailers, to complement the vehicles' front and rear position lamps.	
Para5.13.5.	<u>Geometric visibility</u> Horizontal angles: $\beta 1$ equal to 45° $\beta 2$ equal to 45° Vertical angles: $\alpha 1$ equal to 10° $\alpha 2$ equal to 20°	The requirement is not consistent with ECE R48. Needs to be revised. $\beta 1$ equal to 80° $\beta 2$ equal to 0° (Not stipulated) $\alpha 1$ (upside) equal to 5°	
Para5.14.4.2 Para5.15.4.2 Para5.17.4.2	5.14 Rr. RR height $\leq 350\text{mm}$	Japan does not object although ECE R48 requires $\leq 250\text{ mm}$ for rear, triangular and side RRs.	
Para5.17.4.3	5.17. SIDE RETRO-REFLECTOR, In length K less or equal to 400mm from the front (600mm if ...) K less or equal to 400mm from the rear.	MVSS requires it to be installed as forward as possible while it is said that the range limit is construed as a position forward of the front axle. However, Japan does not object if the United States and Canada have no room for compromise over the exact application of this proposal. The same applies to the rear.	
Para5.18.4.2	In height height $\leq 350\text{mm}$	Japan will compromise although ECE R48 requires $\leq 250\text{ mm}$.	

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Para5.18.4.3	In length	The same comment as that on para.5.17.4.3.	

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Para 5.19.1.	<p>5.19 DRL <u>Presence</u> Optional on motor vehicles. Prohibited on trailers.</p> <p><u>Note</u>: Daytime running light (DRL) function may be made mandatory by a Contracting Party. DRL function does not have to be performed by daytime running lamps.</p>	<p>In Japan, for example, DRLs (400 cd or more in central luminous intensity) equivalent to the requirement of ECE R87 are prohibited.</p> <p>As the study reported by Japan at the 51st session of GRE indicates, even with DRLs of 400 cd in luminous intensity, the glare against oncoming vehicles will cause safety concerns if the ambient illuminance is 1,000 lx or less. In addition, the ambient illuminance of 5,000 lx or less will constitute a limiting factor for automobile drivers of the visibility of motorcycles. That is why Japan cannot agree to the proposal.</p> <p>Therefore, Japan hopes that the note should be replaced by the text: DRL function may be made mandatory by a Contracting Party, while, on the contrary, it can also be prohibited.</p> <p>If the above revision cannot be made, it needs to be stipulated that each Contracting Party shall specify the requirement of DRL function. This addition will allow Japan to handle this problem by setting in our domestic regulations a requirement such as The daytime running light (DRL) function shall be 300 cd or less in luminous intensity between points H and V. or The daytime running light (DRL) function shall be 1,500 cd or less in luminous intensity between points H and V if the ambient illumination exceeds 5,000 lx; and 300 cd or less if the ambient illumination is not exceeding 5,000 lx.</p>	

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Para 5.19.4.2	In height H2 more or equal to 350 mm H1 less or equal to 950 mm – may be higher if another, regulated lighting or light signalling device accomplishes daytime running light function.	Japan does not object although ECE R48 stipulates a range between 250 and 1,500.	
Para 5.19.8	Tell-tale Circuit-closed tell-tale mandatory if a vehicle is not equipped with a device automatically activating all lamps required for operation of a vehicle at diminished ambient lighting condition.	Japan does not object to this proposal (mandatory tell-tale indicator for DRL only if the vehicle is not equipped with an automatic light control system). However, if the GRE session does not decide to approve our proposal of the comment in para.5.1.7.1 (permission for automatic lighting based on the ambient illumination of the driving beam), the high-beam tell-tale indicators will become useless as well as the DRL tell-tale indicators. Consequently an automatic light control system needs to be made mandatory together with DRL operation. That is why Japan cannot agree to this proposal.	
Para5.20.	5.20. IDENTIFICATION LAMPS (Front and Rear) <u>5.20.1.Presence</u> Mandatory – on vehicles over 2032 mm in overall width.	Japan can accept the requirement of identification lamps because their purpose is different from that of the end-outline marker lamps stipulated in para.5.13.	
Para 5.21.9.1	5.21 Cornering lamp 5.21.9 Other provisions 5.21.9.1. The distance between the cornering lamp and front direction indicator lamp on the same side of the vehicle shall be at least [20 mm]. UK proposal: 100mm	Japan does not object to the addition of distance specifications of cornering lamps and front direction indicators. In this case, it is better for the edge of the apparent surface of the front direction indicators to be limited to the edge of the light emitting surface.	

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		(The same comment in para.5.5.3.2 applies here.)	
Para 5.22.	<p>5.22. CONSPICUITY TREATMENT</p> <p>5.22.1. <u>Presence</u></p> <p>Mandatory – on trailers more than 2,032 mm in overall width and 4,500 kg GVWR. Optional – on other vehicles</p>	<p>The requirement of retro reflective marking in ECE R104, which is similar to the purpose of conspicuity treatment, should be added at least as an alternative.</p> <p>Specifically, the content of para.6.21 in TRANS/WP29/938 of ECE R48 approved by the 130th Session needs to be included.</p> <p>However, if the large difference among the Parties prevents the requirement of GTRs from being specified, it would be an idea to modify the text of para.3.5.14.3 so as to exclude the conspicuity treatment and retro-reflective marking, and then delete this paragraph.</p> <p>ECE R48</p> <p>6.21.1. <u>Presence</u></p> <p>Prohibited on vehicles of category M₁. Optional on vehicles of other categories (M₂, M₃, N₁, N₂, N₃, O₁, O₂, O₃ and O₄).</p> <p>6.21.2. <u>Arrangement</u> (The rest is omitted.)</p>	
Para 5.23. (New)	5.23 REAR MARKING PLATES	<p>If the requirement of conspicuity treatment in para.5.22 is added, although the rear marking plate in ECE R70 is excluded by the requirements in para.3.5.14, it is mandatory both in European countries and Japan. Therefore it is advisable that the rear marking plate be added in GTRs. Japan understands that ECE R48 excludes the equipment requirement of rear marking</p>	

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		<p>plates because there exists a big difference in equipment requirements among the Parties.</p> <p>The rear marking plate equivalent to that of ECE R70, for example in Japan, is mandatory in road vehicles of category 2 and their trailers of 7 tons or over in GVW.</p> <p>The requirements for installation in Japan consist of only the following two items at present; however, a study to comply with the content in Annex 15 of ECE R70 (Guideline for installation) is under way for adoption of ECE R70 scheduled in March 2005.</p> <p>Current requirement for installation in Japan Number of devices: 4 pieces max. In height: H2 <= 1500 mm</p>	

Figure 1

