

**SUBJECT: UNIFORM TECHNICAL PROVISIONS CONCERNING THE FORWARD FIELD
OF VISION-PROPOSAL BY JAPAN**

Ref. Document No. TRANS/WP.29/GRSG/2002/9

INDIA'S COMMENTS:

1. Proposed paragraph 5.1.6 specifies "-----1 meter tall cylinder----- shall be at least partially visible from either point OD or point OE (see figure 1)-----". For verification of the same proposal few experiments were conducted on contemporary vehicles of different designs such as for vehicles having high bonnets especially SUVs. It was observed 1 meter tall cylinder was not seen for the full height.
Therefore, partial visibility as in proposal needs to be clarified further about the extent of visibility both in diameter as well as length
 2. Taking the cue from method suggested by Japan, alternate direct method of verification of Field of vision may be evolved for verification all class of vehicles. This needs formulation of observation screen and distance at which it should be kept from the ocular point as a test method. Specific requirement should be involved for the due to A pillar while negotiating turn towards driver's side.
Incidentally similar direct method of vision has been specified in ECE R46(Rear View Mirrors) which is for rear view mirror installation. Reference may also be drawn from ECE R 8/20/113 for verification of light intensity distribution for Head lamps under passing beam condition. It is important to note that the beam pattern is independent of category of vehicle.
-