

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

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

Transmitted by India

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 proposal, few experiments were conducted by us on contemporary vehicles of different designs including vehicles having high bonnets especially SUVs. It was observed that 1 meter tall cylinder was not visible for its full height.

Therefore, partial visibility as in proposal needs to be clarified further about the extent of visibility both in diameter as well as height.

2. Taking the cue from method suggested by Japan, alternate direct method of verification of Field of vision may be evolved for verification of all class of vehicles. This needs formulation of observation screen and distance at which it should be kept from the ocular point in the test method. Specific requirement as well as appropriate test method should be evolved for a field of driver's vision while negotiating turn towards driver's side which should take into account obstruction due to “ A “ pillar.

Incidentally, similar direct method of evaluation of a vision has been specified in ECE R46 (Rear View Mirrors) which is for installation of rear view mirror. Reference may also be drawn from ECE R 8 /20 /113, regulations for verification of light intensity distribution for Head-lamps under passing beam condition. It is important to note that the specified beam pattern is independent of category of vehicle.