

## **Comment on TRANS/WP.29/GRSG/2004/10/ Rev.1**

Transmitted by the expert from Japan

### **Proposal**

Paragraphs 15.2.4.3.1. and 15.2.4.3.2.

~~in addition, it shall be possible for the driver to detect over its full width an object with width of 1 m and a height of 50 cm~~ **the area at a height of 50 cm above the road surface shall be visible to the driver over a width of 1 m**, which is bounded by a plane parallel to the median longitudinal vertical plane and passing through the outermost point of the vehicle starting from a point 4 m behind the vertical plane passing through the driver's ocular points.

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### **Justification**

Japan supports to specify the requirement for the field of vision of exterior rear-view mirrors, not based on the ground level but based on the position above the road surface. As we had commented in the Informal Document No. 18 of the 83<sup>rd</sup> session of GRSG, that requirement could restrict the enlargement of the mirrors while keeping their visibility.

The provisions "to detect ... an object," in paragraphs 15.2.4.3.1. and 15.2.4.3.2., however, seem ambiguous because they are not stating explicit details as to what extent the object must be visible to the driver. Therefore, Japan proposes to amend it as above.

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