

ECE Regulation No. 48

“Lighting and light signalling installation on vehicles”

Italian comments on document ECE/TRANS/WP.29/GRE/2008/8

(Installation of daytime running lamps)

During GRE 57 GTB presented a proposal for increasing the front direction indicator lamps photometric intensity in relation to the distance between this lamp and the DRL on the same side. (see document ECE/TRANS/WP.29/GRE/2007/21).

Some Delegation in GRE (among these also Italy) deem not justified the need for specific requirements linked to distance between DRL and DI, while other request for different applicable solutions and transitional provisions.

Based on our understanding of the GRE discussion on the above GTB proposal, GTB was requested to duly justify the proposal and OICA to propose adequate transitional provisions for its application.

At the following Session (GRE 58) the item was discussed again but not GTB nor OICA presented the requested justification and transitional provisions. Consequently the item was again deferred to the present (59) session, waiting for the requested justification/proposals.

In the 59th GRE agenda a new document from GTB (ECE/TRANS/WP29/GRE/2008/8) has been presented; surprisingly it does not contain the requested justification but a totally new proposal, again without any technical justification.

Consequently Italy deem necessary that GTB presents adequate justification to its proposal (i.e. practical evidence of the need for requirements on the conspicuity of DI “close” to DRL).

From the technical point of view, Italy has the following comments to document ECE/TRANS/WP29/GRE/2008/8:

- A The new GTB proposal requests for the switching off or dimming of DRL in the case where it is at 100 mm or less from the corresponding DI.
The proposed requirement is the most stringent in the world, even more of the USA and Canadian requirements.
In fact, in the GTB proposal the distance is calculated from edge to edge of the DRL and DI apparent surfaces while USA/CDN 100 mm limit is calculated from the edge of the DRL to the centre of DI, so the edge to edge distance could be = 0 mm in certain conditions.
Please note also that USA/CDN requirements applies to DRLs having a maximum light intensity of 3000 cd when the European maximum is presently 1200 cd (since the French proposal on variable intensity DRL, proposing to increase the light intensity up to 3200 cd, is not already discussed nor accepted).
Finally the USA/CDN requirements allow for alternative solutions such ID increased intensity.
- B In the requirement proposed by GTB a incongruence also exists.
Presently a headlamp of less than 100 mm in diameter is able to fulfil the photometric requirements for the dipped beam headlamp or front fog lamp; consequently an installation layout in which a dipped beam headlamp or front fog lamp of diameter less that 100 mm is fitted between the DRL and the corresponding DI and this last is at a distance from the headlamps of less than 20 mm it can be at the same time at a distance of less than 100 mm from DRL.

In a case such the above example the car manufacturer will be forced to fit a 400 cd (cat 1b) DI and at the same time to switch-off (or dim) the DRL when the DI is activated.

From the technical point of view this is a non sense: if a DI having 400 cd in HV is deemed - from many years - adequate to be fitted closer than 20 mm from a dipped beam HL or front fog lamp, why it is not adequate to be fitted closer than 100 mm (so at least 5 times the distance presently considered) from a dedicated DRL?

Conclusion:

Considering the above comments Italy suggest the following:

- GRE, during the present session, will consider the draft requirements contained in the various proposals (GTB old and new one, OICA, also taking into account the French proposal for Regulation 87 and, of course, our comments above) exclusively from the technical and editorial point of view;
- GTB (or others) will provide, for the next GRE session, justifications (based on “on the field” survey results more than laboratory tests!) if they exist, to the real need for conspicuity requirements for DI “close” to dedicated DRL;
- at 60th Session GRE will decide, based on the justifications from GTB (or others), on the mandatory or optional application of the technical requirements agreed during the present session (adding suitable transitional provisions in the case of mandatory application).
