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Proposal for draft amendments to Regulation No. 121 (Identification of controls, tell-tales and indicators)

The text reproduced below was prepared by the experts from the International Organization of Motor Vehicle Manufacturers (OICA) in order to comment the document GRSG/2010/20 with regards to its proposal for adding a new symbols for "DRLs", "Automatic upper beam switching" and "Automatic lower beam switching".

A. **Proposal**

Table 1, insert new item 3b and introduce new references to footnotes, to read:

No.	Column 1	Column 2	Column 3	Column 4	Column 5
	ITEM	SYMBOL <u>2</u> /	FUNCTION	ILLUMINATION	COLOUR
•••					
3 a	Headlamp high beams	≣ ○ 1/, 13/, 18/	Control	No	-
		<u>1</u> /, <u>13</u> /, <u>10/</u>	Tell-tale	Yes	Blue
3b	Automatic high beams functions	≣ (A)	Control	No	-
		or ■ Or ■ Or AUTO	Tell-tale	Yes	-
•••					

- Framed areas of the symbol may be solid.
- 1/ 6/ 13/ Separate identification not required if function is combined with master lighting switch.
- Symbols employing five lines instead of four (and vice versa) may also be used.
- Symbol may be shown in other colours than specified in column 5 in order to convey different meanings according to the general colour coding as proposed in paragraph 5. of standard ISO."

Insert a new footnote 20/, to read:

"<u>20</u>/ The supplementary letter(s) "A" or "AUTO" may be positioned relative to the outline of the symbol."

B. Justification

- 1. Proposal from CDN to add a new item $N^{\circ}44$ for Daytime Running Lamps (DRL). OICA is of the opinion that it is not necessary to introduce a new item for DRL because such signal is not required by the Regulation $N^{\circ}48$ (Installation of lighting devices). The indication of DRL status is hence kept free to the vehicle manufacturer in UNECE R48 and it would be design restrictive to add one into the Regulation $N^{\circ}121$.
- 2. Proposal from CDN to add a new item N°46 for Automatic upper beam switching.
 - <u>Numbering</u>: OICA believes that such new item would better find place as a new item 3b. This would make it related to the existing item 3, a more logical place for such high beam warning.
 - <u>Title of the item</u>: It is recommended to use a denomination covering all new technologies addressed by the recent amendment to Regulation N°48, i.e. automatic high beam switching as well as all the possible high beam patterns and switching which are regulated in this text (see document ECE/TRANS/WP.29/GRE/2010/40). The symbols proposed by CDN are conform to the ISO standard.
 - <u>Illumination</u>: in conformity with the text proposed by GRE for Regulation N°48, the control does not need to be illuminated, whilst the tell-tale does.
 - Colour: colours for this function are not regulated in Regulation N°48.
- 3. Proposal from CDN to add a new item $N^{\circ}47$ for automatic lower beam switching. Such new item is not necessary as the automatic switching of the low beam is only an option in the current text of Regulation $N^{\circ}48$, for the case the manufacturer opts for DRL equipment, versus alternative options.
- 4. References to the footnotes:
 - Item 3a (new reference): new reference to the existing footnote 18. Other colours than the one indicated in Column 5 may be used when the symbol contributes to the indication of the status of new technologies such as Automatic high beam functions. In this case, the manufacturer can use the tell-tale of item 3a, transformed as 3b by the addition of the appropriate letters, and in a colour other than blue in order to avoid confusion to the driver.
 - New item 3b, reference to the existing footnote 1. As for numerous other symbols used in the table, it is allowed to integrate the symbol in a framed area.
 - New item 3b, reference to the existing footnote 6: it is reasonable to permit identification on the master lighting switch itself if requested so by the manufacturer.
 - New item 3b, reference to the existing footnote 13: it seems reasonable to permit the use of a symbol with 4 or 5 lines as appropriate, as it is already the case for the parent item 3a (new reference).
 - New item 3b: reference to a new footnote 20: some vehicles in current production use the dedicated symbol with the letter "A" positioned relative to the outline of the symbol. Experience shows that such positioning is convenient to the user and no problem of confusion or misunderstanding has ever been reported.