Challenges according to the implementation and usage of the UNIQUE IDENTIFIER
UNIQUE IDENTIFIER
Current markings required on the device

The **approval marking** specify:

1. The contracting party (country) who is responsible for the type approval
2. The Regulation Number the device was type approved to
3. The status of the Regulation at the time of type approval
4. The number of the type approval
5. The different functions that are included in the device
6. Any possible restrictions in mounting height
7. Any possible restrictions in mounting position
8. Any possible restriction to the number of devices necessary (D or Y)

**IMPORTANT:**
ALL these markings must be visible after the installation of the device on the vehicle

The **additional marking** specify:

1. The trade name or mark of the manufacturer
2. The category(ies) of the light source(s) used, if available
3. The light source module identifier, if available
4. The rated voltage or range of voltage
5. ......

These markings must not be visible when the device is installed on the vehicle
Current approval marking problem and UNIQUE IDENTIFIER solution

The idea behind the Unique Identifier

Approval marking of a device used as a beam contributor for different AFS systems
(On any fixed part visible after installation i.e. lens)

Unique Identifier marking of a device used as a beam contributor for different AFS systems
(On any fixed part visible after installation i.e. lens)

The presence of the marking in front of the optics could even have a huge influence on the quality of the real optical system
The approval marking tells you:

1. The contracting party (country) who is responsible for the type approval (E4)
2. The Regulation Number the device was type approved to (148)
3. The status of the Regulation at the time of type approval (00)
4. The number of the type approval (1111)
5. The different functions that are included in the device (IA, 2b, R1, F2)
6. Any possible restrictions in mounting height on the vehicle
7. Any possible restrictions in mounting position on the vehicle
8. Any necessary other devices that should be present (D or Y lamps) Y

The Unique Identifier tells you:

1. The UI number under which the device information is available in the electronic database.

Paragraph 3.3.3. (148) „The approval marking may be replaced by the Unique Identifier (UI), if available.“

UNIQUE IDENTIFIER
Current status

Now: we face reality!

On the device (approval markings + additional markings)

On the device (UI number + additional markings)

In the database (internet)
**UNIQUE IDENTIFIER**
Information required

False: On the device (approval markings + additional markings)

True: On the device (UI number + additional markings)

-> Different interest groups need different parts of the available information

- Manufacturer
  -> all information for own type approvals, some information for all type approvals

- Type Approval Authority
  -> all information for own type approvals, some information for all type approvals

- Periodical technical inspection
  -> some information for all type approvals

- Maintain law and order
  -> some information for all type approvals

- Repair shop(s)
  -> some information for all type approvals

- Vehicle owner
  -> some information for all type approvals

**Conclusion:** Benefit of the Unique Identifier is indivisibly connected to the access rights of the database!
WP.29 – 177th session – March 2019

98. WP.29 decided on the detailed access rights as noted in annex V of this report. WP.29 would revisit the matter at its June 2019 session, if necessary.

<table>
<thead>
<tr>
<th>Explanation</th>
<th>CERT (communication on type approval)</th>
<th>TR (test report)</th>
<th>IF (information document)</th>
<th>OTHER (other documents)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approval granting TAA (for granted approval)</td>
<td>W</td>
<td>W</td>
<td>W</td>
<td>W</td>
</tr>
<tr>
<td>CP applying the UN Reg. for which the approval was granted</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>CP applying UN Reg. 0 (access to the approvals of R0 and the amended UN Regulations)</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>CPs not applying that UN Reg.</td>
<td>R</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Manufacturers *) (only for own approvals)</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
</tbody>
</table>

*) Manufacturers get access upon request to the DETA Administrator.

Note: IWG on DETA will look at expanding access rights for further phases.

**NO ACCESS LEVEL BEYOND CONTRACTING PARTY / MANUFACTURER, BUT MAYBE LATER**

WP.29 – 178th session – June 2019

E. Development of an electronic database for the exchange of type approval documentation (DETA) (agenda item 4.5)

**Documentation:** Informal documents: WP.29-178-22, WP.29-178-23, WP.29-178-24, WP.29-178-25 and WP.29-178-26-Rev.1

59. … He recommended that WP.29 invite GRs, in the context of UI, to consider whether current additional marking provisions were still to be considered part of the approval marking and could be replaced by the UI marking, or these additional markings have an information character and could be provided by alternative means (e.g. insertion in the Communication Form). WP.29 agreed with this suggestion.

**GRE TO DECIDE WHAT MARKING MAY BE REPLACED BY UNIQUE IDENTIFIER**
UNIQUE IDENTIFIER
Options for improvement

Options for the future of the UI

A. Change the text of the Regulations to adapt current situation of the UI and the electronic database.

B. Wait for improvement of the access rights of the database and adapt text as necessary afterwards.

C. Leave everything as it is and see what happens.

UN-R148: Paragraph 3.3.3.: „The approval marking may be replaced by the Unique Identifier (UI), if available.“

WP.29 (177): „Note: IWG on DETA will look at expanding access rights for further phases.“

WP.29 (178): „WP.29 invite GRs ... to consider whether current additional marking provisions were still to be considered part of the approval marking and could be replaced by the UI marking“
### UNIQUE IDENTIFIER

**Possible improvement – Text of the Regulation(s)**

<table>
<thead>
<tr>
<th>Information included:</th>
<th>Benefit:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The UI number</td>
<td>- Smaller marking</td>
</tr>
<tr>
<td>2. The trade name or mark of the manufacturer</td>
<td>- Missing Information?</td>
</tr>
<tr>
<td>3. The category(ies) of the light source(s) used</td>
<td></td>
</tr>
<tr>
<td>4. The rated voltage or range of voltage</td>
<td></td>
</tr>
</tbody>
</table>

#### Current text of UN-R148

(pending on the availability and accessibility of DETA)

<table>
<thead>
<tr>
<th>IB 2aY R1 F2</th>
<th>T E4</th>
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</thead>
<tbody>
<tr>
<td>148R00-1111</td>
<td></td>
</tr>
</tbody>
</table>

#### Marking(s) on device

- **UI 270650**

#### Possible changes to the current text

- **Add mandatory information (e.g. Symbols)**
  - Work in progress!

- **Remove mandatory information (e.g. additional symbols)**
  - Work in progress!
### UNIQUE IDENTIFIER
Options for improvement – Update DETA

<table>
<thead>
<tr>
<th>Approval granting TAA (for granted approval)</th>
<th>CERT (communication on type approval)</th>
<th>TR (test report)</th>
<th>IF (information document)</th>
<th>OTHER (other document)</th>
<th>Summary &amp; description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CP applying the UN Reg. for which approval was granted</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>CP applying UN Reg. 0 (access to the approvals of R0 and the annexed Regulations)</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>CPs not applying that Reg.</td>
<td>R</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>R</td>
</tr>
<tr>
<td>Manufacturer (only for own approvals)</td>
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<td>R</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Periodical technical inspection</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>R</td>
</tr>
<tr>
<td>Organizations to maintain law and order</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>R</td>
</tr>
<tr>
<td>Repair shop(s)/ Vehicle owner</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>R</td>
</tr>
<tr>
<td>Public</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>R</td>
</tr>
</tbody>
</table>

Access rights as accepted by WP.29 177

**Explanation:**
- **R** = read only
- **W** = read + write + delete

**UNIQUE IDENTIFIER**

```
UI 270650
```

**Summary & description**

```
00 XEWR 11111 22222 33333 44444
00 XCV 55555 66666 77777
00 XCWT 88888 99999
00 XCVR 121210 112211
00 XCWR 14441 14442
00 XCWR 552200 552201
```

**Additional information**

---

9
Options for improvement – Do nothing and see what happens