

Japan's comments on the document ECE/TRANS/WP.29/GRE/2019/22 submitted by the experts from Germany

Japan basically agrees with the proposal made by Germany. However, Japan considers that there are still certain points that are unclear in the proposal ECE/TRANS/WP.29/GRE/2019/22 submitted by Germany, that has been amended, based on the proposal GRE-81-17 submitted by Japan.

1. First, the grounds for taking $F_{ph}=3$ as the reference value are not clearly provided. Please provide us again with the grounds for the reference value.
2. Second, based on the documents from Germany, Japan examined the validity of the proposed methods for the measurement test and, after conducting actual measurements, found three practical concerns as to those methods:
 - First, upon installing the devices as instructed in the documents from Germany, we found out that the light emitting surface was blurred by halation, making it impossible to identify the borderlines correctly.
 - Second, since the measurement value of the luminance meter may be saturated by irradiating the lamp with high intensity test light, the accurate luminance necessary for calculating the reference value may not be obtained.
 - Third, the documents from Germany give multiple options for the color temperature of the test light source, but this might lead to discrepancies in the test results due to color temperature.

Hence, we have not yet established a reliable measurement method.

Please provide us with further details of the measurement methods used in Germany.

3. Finally, at the previous meeting of GRE, Japan was of the opinion and it was generally agreed that we need to provide a sufficient transition period before multiple CPs introduce this new regulation, but the draft regulation does not make this clear. Japan considers it essential to provide a sufficient period of acclimatization in order to establish a reliable measurement method.