

IMMA comments on WP29/2001/14:

Proposal for Draft Supplement to Regulation 39 (Speedometers)

1. Background

After several discussions, GRSG agreed to harmonise Regulation 39 with the latest EU Directive. Having compared WP29/2001/14 with the Directive 2000/7 IMMA wishes to make the comments listed below.

2. Comments

Page 1: Paragraph 1

The limitation to mopeds with a maximum design speed of over 25 km/h is not in the Directive; all mopeds are covered.

Recommendation: delete the proposed text.

Page 3 : (new) Paragraph 5.1.5

The text reads: "...The highest value indicated on the display shall not exceed 50 mph...". This sentence does not appear in the directive.

In addition, although this text repeats the requirement for speedometers in countries where metric units are used, which is logical, it should be borne in mind that countries using imperial units are small moped markets. The flexibility of being able to use speedometers fitted to small motorcycles for moped applications would be reasonable, as well as advantageous to manufacturers.

Recommendation: delete the sentence to align the text with the Directive.

Page 4 : amended Paragraph 5.2.5.

In the right-hand column of the chart, the 25% value in the four boxes does not exist in the Directive.

Recommendation: delete the 25% values in the table, to align the text with the Directive.

Page 5 : Annex 3, amended Paragraph 2.2.

The value of "... +8 km/h" in the formula for the L-category vehicles is correct for L3, L4 and L5. For L1 and L2, the value should be "...+4 km/h" in order to align with the Directive.

Recommendation: align the text with the Directive.
