

Topic: Re. FW: GRE «Horizontal Reference Document» (HRD) Working Group

Referring to your letter from the 21st of December 2010 we communicate our proposal in regard to the “Horizontal Reference Document” (HRD). The proposal consists of a scheme of a new structure for the current ECE UN Regulations, which includes “common basic regulations for all lighting and light–signaling devices and systems” as well as the “common parallel Horizontal Reference Document” (HRD) for all lighting equipment and systems. The new structural scheme of the ECE UN Regulations is presented in Fig. 1 and 2. It is supplemented by a short explanatory note.

With best regards
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Explanatory note concerning Horizontal Reference Document (HRD) proposed by France

We consider the existing system of ECE UN Regulations to be very clear and convenient. If it has to be changed, we would prefer to make it more consistent with the American system of standards.

- 1) Eliminate the numbers and names of individual standards and avoid quoting them in any documents.
- 2) All information about all regulations should be split between two documents:
 - (a) Common Basic Regulations for all lighting and light-signaling devices and systems.
 - (b) Horizontal Reference Document for all lighting and light-signaling devices and systems (HRD).
- 3) The proposed structure of both documents, which are designed to replace the ECE Regulations is presented in Fig 1. and 2.
- 4) It is not explicitly shown in the proposed structure that lighting and light-signaling devices belong to specific categories of vehicles because it is already written in R.48. The choice of lighting and light-signaling devices to be installed in different vehicles is determined by technical specifications.
- 5) It is supposed that the Common Basic Regulations will contain only two kinds of references: to R.48 and sections of "HRD".
- 6) The "HRD" is going to contain only one reference in the beginning: "Technical requirements and specifications for lighting and light-signaling devices and systems are quoted in the common basic regulations".

New proposed structure of the ECE Reference Document proposed by France

Fig. 1: Common Basic Regulation for All Lighting and Light-Signaling Devices and Systems

| Chapter N... Name of a lighting or light-signaling device or system | Sections of the chapters of the Common Basic Regulations |
|--|--|
| Example: Direction indicators of the categories 1a, 2a, 5, 6, 11... (For all motor vehicles, motorcycles, mopeds and trailers) | A. <u>Administrative provisions</u> 1. Scope 2. Definitions 3. Application for approval 4. Markings 5. Approval B. <u>Technical requirements</u> |
| Example: Stop lamps of the categories S1, S2, S3, S4 ... (For all motor vehicles, motorcycles, mopeds and trailers) | Same as above |
| Example: Position lamps for all motor vehicles, motorcycles, mopeds and trailers | Same as above |
| Chapters for other types of lighting and signaling devices | Same as for all other chapters |

Notes:

1. May contain references to R.48 for some technical requirements.
2. May contain references to individual sections of "HRD".

Regulations in response to the Horizontal

Fig. 2: Common Horizontal Reference Document (HRD) for All Lighting and Light-Signaling Devices and Systems

Should be split to chapters following different device names

| Chapter N... Name of a lighting or light-signaling device | Sections of every chapter of "HRD" |
|--|---|
| Example: Direction indicators... | 1. Communication form 2. Examples of approval marks' arrangement 3. Chronological order of approval tests 4. Testing methods 5. Further administrative provisions 5.1. Modification of the device type and administrative provisions |

| | |
|---------------|--|
| | 5.2. Conformity of production 5.3. Penalties for non-conformity 5.4 Production definitely discontinued 5.5. Names and addresses of technical services 6. Transitional provisions |
| Other devices | Same as above |

Note:

The “HRD” document contains only one reference to the basic regulations