

COMMENTS FROM INDIA ON MCSYM-02-01 Rev 1
DRAFT GTR FOR LOCATION AND IDENTIFICATION OF MOTORCYCLE CONTROLS, TELL-TALES AND INDICATORS

A. In the text

SI .No.	Item	Proposal to amend as	Justification
A1	I.	<p>INTRODUCTION</p> <p>(a) This proposed global technical regulation (gtr) establishes -- another. <i>There are considerable differences in the national and regional legislations regarding which are the mandatory controls, their location and method of operation.</i></p> <p>(b) <i>Identifying tell tales</i> One of the ---- a global motorcycle market. Furthermore, -- on space-limited dash panels. Symbols are --- driver confusion. <i>Considering the above, contracting parties, while implementing this GTR into their national legislation may permit words, in place of or in combination with the symbols.</i> When implementing this global technical regulation into national legislation, Contracting Parties may define other operational requirements than those given in this global technical regulation. The symbols -- the symbol.</p> <p>(c) <i>Provision of Controls, their location and operation</i> <i>In the various national and regional regulations, the requirements for installation and operation of controls differ considerably. Therefore, when implementing this GTR into national legislation, the contracting parties would find it desirable, to define operational requirements varying from those specified in GTR. This may lead to a situation where too many variations occurring in different regions. Attempt to reduce this to the extent practically possible, has been achieved by:</i></p> <ul style="list-style-type: none"> <i>i. Covering the requirements of as many controls as possible. This does not imply that all those included in this GTR are mandatory. Each Contracting Party decides the mandatory controls necessary in their region.</i> <i>ii. Prescribing the requirement acceptable to all the contracting parties for location and operation of controls in the GTR</i> <i>iii. Prescribing alternative requirements for location and operation of controls in the GTR. Such alternatives may be permitted by a Contracting Party as alternate, if they specifically desire to do so.</i> 	<p>During the discussions in the MCSYM 2 meeting on 19th October 2010, expert from Canada had stated that Canada will not be in a position to permit alternative locations or methods of operation of controls than those permitted by the Canadian legislation. The expert from USA explained that situation in USA is the same. The expert from India had suggested that such alternates would be conditional and may be permitted by the Contracting parties only if they desire to do so. It was then agreed that this conditions should be included in preamble and a cross reference should be given to the para number of the preamble wherever such alternatives are provided in GTR text.</p> <p>It may also be noted that in the case of GTR 3 (Motor cycle brakes), such alternatives have been provided. In the case of GTR 2 (WMTC) WP.29 has already given in- principle approval for such alternates.</p>

SI .No.	Item	Proposal to amend as	Justification
A2	IV, 1st para	GRSG followed the recommendations ---- under the 1958 Agreement or a global technical regulation in the compendium of ---- listed below:	The word “global” should be deleted, since the compendium contains regulations which are <i>candidates</i> for GTRs and not <i>GTRs</i> themselves
A3	4.4.1 & 4.4.2	4.4.1 At the manufacturer’s option, any control, indicator and their respective identification symbols may be capable of being illuminated. If so illuminated: 4.4.2 [Means may be provided for illuminating tell-tales and their identification symbols to make them visible to the driver under daylight and night time driving conditions.]	Both the clauses convey same meaning. Any one of them may be retained and other to be deleted. Corresponding changes in the clause numbers would be needed.
A4	4.5.2	The colour of indicators, tell-tales and the identification symbols for indicators and controls not listed in Table 1 shall be selected by the manufacturer in accordance with paragraphs 4.5.3 and 4.5.4. ----	Color reference in this clause is for tell tales only.
A5	4.5.5	The filled-in part of any symbol may be replaced by its outline and the outline framed areas of any symbol may be filled in.	This requirement refers not to the outline of the symbol but to the framed areas of the symbol.

B. In Table 1

Sl.No.	Row No.	Column No.	Subject	Proposed change	Justification
B1	13	3	Passing beam/dipped beam	Tell tale <i>(optional)</i>	India had proposed that these tell tales may be kept optional, as they are not mandatory in any of the national or regional legislations. During the discussions in the MCSYM 2 meeting on 19 th October 2010, the expert from IMMA had requested India to reconsider the suggestion. However, in the subsequent discussion, IMMA expert had confirmed that these tell tales are not mandated in the national and regional regulations and agreed to incorporate the suggestion from India.
B2	19	3	position lamp	Tell tale <i>(optional)</i>	
B3	20	3	Master lamp	Tell tale <i>(optional)</i>	
B4	21	3	Parking lamp	Tell tale <i>(optional)</i>	
B5	18	6	Hazard warning signal	<i>The operating tell tale</i> represented by either the direction indicator tell-tale(s) flashing simultaneously, or by a given triangle symbol. <i>The identification of control by the given triangle symbol</i>	The two arrows symbol should be used only for the tell tale and not for identification of the control, as this symbol is also common for the direction indicator control. Hence the identification symbol for the hazard warning signal control should be only the triangle. The operating tell tale for the hazard warning can be the "two arrows".
B6	11	4	Audible warning device	on the left --in conjunction with the clutch. <i>Alternatively (See item I (c) iii of Section A) left or right handle bar irrespective of clutch or gear selection operation</i>	Same as the justification given for Sl. No. A1
B7	12	4	Headlamps Driving beam (Main beam)	on the left --- clutch <i>Alternatively (see item I (c) iii of Section A) left or right handle bar irrespective of clutch or gear selection operation.</i>	Same as the justification given for sl. No. A1
B8	13	4	Headlamps Passing Beam (Dipped Beam)	on the left --- operated clutch <i>Alternatively (see item I (c) iii of Section A) left or right handle bar irrespective of clutch or gear selection operation.</i>	Same as the justification given for sl. No. A1

Sl.No.	Row No.	Column No.	Subject	Proposed change	Justification
B9	32,	7	Foot selector manual gear shift control	<p>Foot lever or rocker arm</p> <p>Moving the ----d position in the gear selection order (i.e: 1-N-2-3-4. or N-1-2-3-4.).</p> <p>Alternatively (See item I (c) iii of Section A): For vehicles with an ---: N-1-2-3-4-5-N-1.)</p> <p>Alternatively (See item I (c) iii of Section A): Reverse pattern, --- gear position</p>	Same as the justification given for sl. No. A1
B10	33	7	Hand selector manual gear shift control	<p>If the --- order (i.e: 1-N-2-3-4... or N-1-2-3-4...).</p> <p>For vehicles with an engine capacity of less than 200cc, transmissions with the following shift patterns may be fitted:</p> <p>—Rotary pattern (i.e: N-1-2-3-4-5-N-1.)</p> <p>—Reverse rotary pattern,</p> <p>The rotating handgrip, after gear selection, may return to neutral position.</p>	The rotary pattern of hand selector manual gear shift control is not used in any of the vehicles, to the best of our knowledge. Also there has been no proposal for inclusion so far.

C. Editorial corrections in the text

Sl.No.	Item	Proposal to amend as	Justification
C1	IV	EC Directive 2009/80/EC – Identification of controls, tell-tales and indicators <i>for two or three-wheel motor vehicles</i> . as amended by Commission Directive 93/91/EEC;	Editorial correction. (Directive 93/91/EEC is not an amendment to Directive 2009/80/EC, hence reference to the same should be deleted).
C2	V, 1st para	Although this proposal ---and location of motor vehicle <i>motorcycle</i> controls, tell-tales and indicators.	Editorial
C3	V, 4th para	Defining the installation <i>location</i> , operation and identification ---- global harmonization.	Editorial
C4	1.	This global technical regulation --- safety hazards that would otherwise be caused by the diversion of the rider's attention from the driving task <i>and</i> by mistakes in selecting controls.	Editorial
C5	4.2.1	The controls, listed --- and within in reach of --- in the driving position.	Editorial
C6	4.3.1	Each control, tell-tale and indicator listed in Table 1, shall be identified by the relevant specified symbol. Small deviations in the design of the symbols listed in column 3 2 of table 1 are allowed.	Editorial
C7	4.3.2	When implementing this global technical regulation into national legislation, Contracting Parties may allow the use of supplementary words in conjunction with or in lieu or with <i>of</i> any symbol	Editorial
C8	4.5.3.3	green: safe, normal operating condition (except if blue or yellow <i>amber</i> is required by Table 1.).	Editorial.
C9	4.6.6	Information displayed in the common space may be cancellable automatically or by the driver, except that for the tell-tales of for headlamp driving beam and a direction indicator and those for which the colour red is required by Table 1 shall not be cancellable if the condition exists for their activation.	Editorial.

D. Editorial corrections in the Table.

Sl .No.	Row No.	Column No.	Subject	Proposed change	Justification
D1	14	7	optical warning device	May be an additional function of the Driving Beam/Passing Beam-Switch <i>control.</i>	Editorial