

## **Clarification on India's formal proposal**

**Document no ECE/TRANS/WP.29/GRE/2018/47**

The text reproduced below is prepared by the experts from India, includes:

1. Clarifications on the formal document ECE/TRANS/WP.29/GRE/2018/47 submitted by India in the 80<sup>th</sup> session of the working party on Lighting and Light-Signalling (GRE) on making Front Position lamp Optional with changes to electrical connection for L<sub>3</sub> category.
2. Conditions of making fitment of FPL only under specific conditions. This was proposed in 77<sup>th</sup> Session of GRE as informal document GRE 77-08, however it got removed by mistake while transposing to formal document.
3. India attempt to respond to queries being sought by CP's during the 80<sup>th</sup> Session same has been incorporated as Annex to this proposal.

The changes w.r.t ECE/TRANS/WP.29/GRE/2018/47 are ~~striketrough~~ for deleted characters and in **bold** for addition of new text

## I. Proposal

*Paragraph 5.14.6., amend to read:*

5.14.6. Front position lamp (paragraph 6.6.);

**Front Position Lamp(s) fitment is ~~optional~~ mandatory in the case where the following cases**

**(a) Failure of light source of one headlamp beam will ~~not~~ affect the functioning of all other headlamp beam(s) and**

**(b) Vehicle is not fitted with daytime running lamp.**

**5.14.6.1 If fitted the front Position lamp must comply with individual requirement as specified in paragraph 6.6 below”**

*Paragraph 5.15.4, amend to read:*

**“5.15.4. Front position lamp (paragraph 6.6). ~~subject to the condition of 5.14.6”~~  
Cases other than those specified in paragraph 5.14.6 above”**

## II. Justification

1. India understands that without addressing the redundancy requirements, the front position lamps (FPL) may not be made optional. Justification w.r.t redundancy has already been presented by India in formal proposal in document no ECE/TRANS/WP.29/GRE/2018/47, India would however also like to mention again that;
  - 1.1 FPL should be mandatory only if ‘**no other**’ lamp is showing light at the front of vehicle, this is evident from the table below (See Sr No 4). With one failure conditions as stated below FPL would not be needed (See Sr No 1,2 & 3).

| Sr No | Fitment of lamps   | Failure condition   | Redundancy                    | Requirement         |
|-------|--|---------------------|-------------------------------|---------------------|
| 1     | DRL fitted.  | DRL failed          | Headlamp will work            | FPL not required    |
| 2     | DRL not fitted however Main & Dipped beam Independent.   | One HL Beam failed  | Other Headlamp beam will work | FPL not required    |
| 3     | Main beam & Dipped beam reciprocally incorporated with Double filament lamp.   | One Filament failed | Other Filament will work      | FPL not required    |
| 4     | Main beam & Dipped beam reciprocally incorporated with Single filament lamp operating at different voltages (e.g. H9) or distributed light | Filament failed     | No HL will work               | <b>FPL required</b> |

India would also like to mention that the condition stated for making FPL mandatory is not because of field failure of dipped beam but to take care of a condition wherein failure of dipped & main beam having one light source and without DRL exist.

2. India's explanation to the queries raised by experts from some of Contracting Parties are given in the attached Annex.

## Annex

### India Response to the queries of GRE members in 79<sup>th</sup> & 80<sup>th</sup> GRE Session

**1. Is the FPL fitted to be only used in the case of failure of the headlamp?**

India Remark: No. FPL is mandatory If Headlamp design is such that the failure of the light source causes both Main and Dipped beam becomes inoperative example:

- a. Single filament (E.g. H9 Bulb)
- b. A common light source.

In such cases the FPL should comply to all the individual & electric connection as per the regulation

**2. Can we use same text as in Regulation R74 (For mopeds)?**

India Remark: No. In-case of R74 FPL is optional, however there is No redundancy built in.

**3. Geometric visibility requirement will not be met with Passing beam**

[India remark: AHO came after FPL and subsequent to that DRL was incorporated, India understands that Geometric visibility for conspicuity from front can be met with AHO or DRL at minimum]

**4. Reference In R48**

India remark: UN R48, prescribes only the condition for using other lamps for carrying out the function of FPL, hence does not give any useful input for 2 wheeler.