

## **Comments on GRE/2020/15 and LEDr Light Source package**

OICA experts have made a full review of the GRE/2020/15 and found some concerns:

1. In paragraph 4.2.2.1., it is written that the light source manufacturers will develop and update a website listing the LEDr light sources that could be installed on which vehicles.  
➔ Explanations needed on how it will be performed (regular updates, legal responsibilities of the information, etc...)
2. In paragraphs 5.23 and 5.23.1 of UN R48, the following is been requested:  
*5.23. Lamps approved with light source(s) according to UN Regulation No. 37, except when such light sources are used as non-replaceable light source(s) as defined in paragraph 2.9.1.2., shall be fitted in a vehicle in such a way that the light source can be correctly replaced without the need for expert assistance and without the need for special tools, other than those provided with the vehicle by the manufacturer. The vehicle manufacturer shall provide with the vehicle a detailed description of the procedure for replacement.*  
*5.23.1. In the case where a light source module includes a holder for an approved replaceable light source according to Regulation No. 37, this light source shall be replaceable as required in paragraph 5.23. above.*  
**The question is whether the LEDr light source can be replaced as the filament lamps or not. This may not be the case because of their design. In this case we, as vehicle manufacturers, do not describe how the LEDr light sources can be replaced.**
3. OICA experts wants a clarification on responsibilities. Especially, a kind of sentence like ‘vehicles not listed on this website have not been tested’.

Furthermore, with the number of informal documents added on LEDr light source issue, it is not possible for OICA experts to carefully check all impacts of such light sources installed on their vehicles.

---