

Questions and Concerns from OICA regarding document GRE-84-29 and GRE-84-30 from Japan

- OICA believes that an answer-back signal indicating that the doors of a vehicle are locked or unlocked is not the right approach. The spirit of the signal defined is much more like a wake up/shut down signal. It indicates more the process of the vehicle becoming ready for the normal condition of use or shutting down from the normal condition of use.
 - The answer-back signal is only allowed when the vehicle is in the park-condition (see requirements in UN R.48 below). This would have an implication on, for example, trucks with air suspension. When the engine is OFF the suspension will release air and the height of the lamps will change.
 - Would a manual or automatic check of the lamps before driving still be possible if the answer-back signal was introduced in UN R.48?
 - Why is flashing allowed and sequential activation not permitted?
 - Is an amendment of § 5.9.1. and § 5.9.2. (see below) necessary to allow the flashing of all the lamps mentioned?
 - A combination of the mentioned lamps must be permitted.
 - We have some concern about the requirements in §5.12. (see below) in UN R.48? The possibility to switch ON main-beam, dipped-beam and front fog lamps only if lamps referred to in §5.11. are also switched ON. Would it apply when dipped-beam headlamps are switched ON as an answer-back signal? Exemption needs to be clearly defined.
 - Please could you share the justification for the maximum of 3 seconds duration for the answer-back signal? Why not 5 seconds, 10 seconds or more?
 - The proposed amendment of §5.1 is a fundamental change in UN R.48. If this is agreed, all subparagraphs of paragraph 6 should be checked whether the lamps should be allowed to be switched ON when the vehicle is parked. In addition, it may become necessary to specify the allowed conditions.
 - Why are Daytime Running Lamps and Adaptive Front Lighting Systems (AFS) excluded?
- 2.3.11. *"Park condition of a vehicle" means:*
- 2.3.11.1. *For a motor vehicle, when the vehicle is at standstill and its propulsion system is not running and its movable components are in the normal position(s) as defined in paragraph 2.3.9.;*
- 5.9.1. *Direction-indicator lamps, the vehicle-hazard warning signal, amber side-marker lamps complying with paragraph 6.18.7. below, and the emergency stop signal shall be flashing lamps.*

- 5.9.2. *The photometric characteristics of any lamp may vary:*
- (a) In relation to the ambient light;*
 - (b) As a consequence of other lamps being switched ON or OFF;*
or
 - (c) When the lamps is being used to provide another lighting function; provided that any variation in the photometric characteristics is in compliance with the technical provisions for the lamp concerned.*
- 5.12. *The electrical connections shall be such that the main-beam and dipped-beam headlamps and the front fog lamps cannot be switched ON unless the lamps referred to in paragraph 5.11. are also switched ON. This requirement shall not apply, however, to main-beam or dipped-beam headlamps when their luminous warnings consist of the intermittent lighting up at short intervals of the main-beam headlamp or the intermittent lighting up at short intervals of the dipped-beam headlamp or the alternate lighting up at short intervals of the main-beam and dipped-beam headlamps.*