

Japan's answers to the document GRE-84-33 submitted by the experts from OICA

Questions and Concerns from OICA regarding document GRE-84-29 and GRE-84-30 from Japan	Japan's answer to the document GRE-84-33 from OICA
1 • 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.	→ This comment seems derived from concern that Answer-Back Signal may include "welcome scenario" and "bye-bye scenario" lamps. However, Our proposal has been modified by document GRE-84-29, and now Answer-Back Signal clearly does not include Lamps with constant luminosity according to the new paragraph 2.6.4, in the definition of the signal. Japan hopes that OICA's concern has been allayed. If not, we would like to ask OICA what is your concern and what is different between wake up/shut down and lock/unlock.
2 • 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.	→ Thank you for your valuable comments. Based on your comment, we are considering to add an exemption clause to 6.27.4., "Position" of Anser-Back Signal, like "only for vehicles without air suspension." If you have a good draft text to add an exemption, please provide it.
3 • 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?	→ Yes. This is fine as long as the lights you refer to for manual or automatic checks of the lamps do not contravene our proposed ABS definition or regulations. Conversely, if they are flashing for more than 3 seconds, they are subject to regulation.
4 • Why is flashing allowed and sequential activation not permitted?	→ Sequential activation signal is also permitted in our proposal. See 6.27.7.3 of GRE-84-29.
5 • Is an amendment of § 5.9.1. and § 5.9.2. (see below) necessary to allow the flashing of all the lamps mentioned?	→ Thank you for your suggestion. Japan also like to make amendments to 5.9.1 and 5.9.2
6 • A combination of the mentioned lamps must be permitted.	→ Combination of the mentioned lamps is also permitted in our proposal. See 6.27.7.8 of GRE-84-29
7 • 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.	→ Thank you for your valuable comments. Japan would also like to consider adding another exemption clause in response to 6.27., a text referring to 6.24.9.2, of "other requirement" for Exterior courtesy lamp. If you have a good draft text to add an exemption, please provide it. (reference)UN R48, 6.24.9.2. → Approved lamps emitting white light with the exception of main beam head lamps, day time running lamps and reversing lamps may be switched ON as courtesy lamp function. They may also be switched ON together with the exterior courtesy lamps and the condition of paragraphs 5.11. and 5.12. above may not apply.
8 • 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?	→ Japan proposes 3 seconds as the maximum duration because there is no reason to change from that of providing information on the status of the VAS (set, unset, alarm setting period, alarm has been activated) of immobilizer as stipulated in 6.3.9.2. of UN R116 from approximately 20 years ago. Those optical signal of ABS and immobilizer are similar. If there is some evidence showing that longer duration is also safe, we are glad to take it into account. → (reference)UN R116, 6.3.9.2. If an indication of short-term "dynamic" processes such as changes from "set" to "unset" and vice versa is provided, it shall be optical, according to paragraph 6.3.9.1. Such optical indication may also be produced by the simultaneous operation of the direction indicators and/or passenger compartment lamp(s), provided that the duration of the optical indication by the direction indicators does not exceed 3 seconds.
9 • 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 "Park condition of a vehicle".	→ Japan agrees that the amendment of 5.1 is a fundamental change and it would need much more time to discuss, and that is why Japan split the working document GRE/2021/2 to the two informal documents. We would like to discuss this issue in the next GRE session.
10 • Why are Daytime Running Lamps and Adaptive Front Lighting Systems (AFS) excluded?	→ These two lamps are excluded because both DRL and AFS can emit light upwards which may cause glares for other traffic users.

(reference)UN R48

2.3.11.

"Park condition of a vehicle" means:

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.;

2.3.11.1.

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.

5.9.1.

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.