

Questions and Concerns from OICA regarding documents GRE/2021/2, GRE-84-29 and GRE-84-30 from Japan

- OICA believes there is currently no clear statement of the problem that Japan is trying to address. Japan has shown an example of the Tesla Model X, but this example has to be activated by the driver prior to ignition being switched OFF and is only available via a specific menu. The feature is not an answer back signal, nor is it a part of the type approval process.
- 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.
- For a number of years, there have been wake up and shut down sequences of different types operating on the street without any adverse reaction reported.
- Wake up sequences give customers confidence that their lighting functions are operating correctly before commencing a journey. The follow-me-home (shut down) function also provides re-assurance when parking at night.
- Regulating the wake up/shut down signal when the vehicle is in the park-condition introduces a huge complexity into the regulations for a vehicle status which is currently out of the scope of UN Regulation No. 48. A whole new set of requirements will need to be established to control the vehicle lighting logic.

This could also have implications on:

- vehicles with air suspension. When the propulsion system is OFF the suspension can release air and the height of the lamps may change.
- visibility around trucks. When a truck is parked by the side of the road during work/loading/unloading, lighting could be of high importance from a safety perspective, especially in a dark environment e.g. during night-time.

OICA Open Questions for GRE-85:

- 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 while sequential activation not permitted?
- Why are Daytime Running Lamps and Exterior Courtesy Lamps excluded?