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World Forum for Harmonization of Vehicle Regulations

Working Party on Lighting and Light-Signalling

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Item 6 (a) of the provisional agenda

UN Regulation No. 48 (Installation of lighting and light-signalling devices):

Proposals for amendments to the latest series of amendments

Proposal for Supplements to UN Regulations Nos. 48 and 148

Submitted by the expert from France and Germany*

This document is a revised proposal that allows the use of manufacturer logos inside the illuminant surface of a signalling lamp. It is based on ECE/TRANS/WP.29/GRE/2020/5/Rev.1 which was submitted to and finally withdrawn at the eighty-fourth session of the Working Party on Lighting and Light-Signalling (GRE). The modifications to ECE/TRANS/WP.29/GRE/2020/5/Rev.1 are shown bold, both for part I "Proposal" and part II "Justification".

* In accordance with the programme of work of the Inland Transport Committee for 2021 as outlined in proposed programme budget for 2021 (A/75/6 (Sect.20), para 20.51), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



I. Proposal

A. Proposal for a Supplement to UN Regulation No. 148

Add a new paragraph 3.1.2.1. (g) to read:

- "3.1.2.1. ...
(g) In the case of a lamp that may incorporate a **vehicle** manufacturer logo, the **vehicle** manufacturer logo.
..."

Add a new paragraph 3.1.2.2. (e) to read:

- "3.1.2.2. ...
(e) In the case of a lamp that may incorporate a **vehicle** manufacturer logo, **the applicant shall confirm by a statement provided by the vehicle manufacturer** that the **vehicle** manufacturer logo is **the official appropriate one** related to the brand name of the vehicle manufacturer or body manufacturer.
..."

Add a new paragraph 4.5.6. to read:

- "4.5.6. On request of the applicant, the internal structure of the optical components and/or the texture of the outer lens inside of the apparent surface of a lamp (function) may incorporate only one manufacturer logo build by transparent or non transparent components provided that all requirements for the specific function of this Regulation are fulfilled and in addition the following conditions:
- (a) Irrespective of the marking requirements in paragraph 3.3., only the logo of the brand name of the vehicle manufacturer or the body manufacturer is allowed. This shall be confirmed by the applicant by a statement (see paragraph 3.1.2.2. (e)).
 - (b) Size: the enclosed light emitting surface of the logo (incorporating transparent and non transparent components of the logo) of such a lamp in the direction of the reference axis shall not exceed 100 cm².
 - (c) Symmetry: notwithstanding the requirements of paragraph 5.5.2. of UN Regulation No. 48, the logo light emitting surface (incorporating transparent and non-transparent components of the logo) does not have to be symmetrical by itself.
 - (d) Stop lamps, direction indicator lamps, and reversing lamps shall not incorporate a logo.

B. Proposal for a Supplement to the 06 series of amendments to UN Regulation No. 48

Add a new paragraph 2.1.7. to read:

- "2.1.7. "Manufacturer logo" means a graphic mark, emblem, word, or a combination of those elements, used to aid and promote public identification and recognition of a **vehicle** manufacturer's brand name.

Add a new paragraph 5.5.5. to read:

- "5.5.5. In case of lamps incorporating a manufacturer logo, only two lateral logos (one on each side) or one central logo can be fitted on the rear of the vehicle and

only two lateral logos (one on each side) or one central logo can be fitted on the front of the vehicle."

Add a new paragraph 5.30.1. to read:

"5.30.1. Especially in case of light-signalling lamps incorporating a manufacturer logo, the lamp shall be type approved according to the requirements of the UN regulation No 148."

II. Justification

1. In the recent years, some lamps have been approved with apparent surfaces that could have evocative/suggestive/figurative shape. At the seventy-eighth session of GRE, the experts from France and Germany raised questions on this issue (GRE-78-03). Following the discussion, a questionnaire was prepared and sent to all Contracting Parties. **The results were presented at the eightieth session of GRE (GRE-80-28). The questionnaire allowed Contracting Parties, at the eightieth session, to agree on the necessity of regulating the introduction of the concept of logos on light-signaling functions, and to agree on the need to define restrictive criteria to be set in the UN Regulations.** A formal proposal (ECE/TRANS/WP.29/GRE/2019/6) was submitted by the experts from France and Germany at the eighty-first session of GRE. At the eighty-second session of GRE, France and Germany presented a new working document (ECE/TRANS/WP.29/GRE/2019/28) and an informal document amending it (GRE-82-32). This revised proposal is in accordance with the comments received at that session of GRE and takes on board some of the changes proposed in informal documents GRE-82-20 and GRE-82-36.

2. To find the best solution, the following three choices were considered:

- (a) leave the UN Regulations as they are, with no mention of logos;
- (b) forbid logos explicitly;
- (c) allow logos in a very restrictive way.

Option (a)

3. The existing UN Regulations do allow symmetrical logos, as long as the logo is part of an existing signalling function, because there is no restriction on shape and luminance distribution in the UN Regulations, to avoid being design restrictive.

4. Depending on the design, self-illuminated logos may nevertheless cause distraction. Indeed, in the existing UN Regulations, the number and size of logos in particular are not framed or restricted. Moreover, the symmetry of the light function has to be respected, which excludes unsymmetrical logos and could create unfair competition between car manufacturers.

5. As a conclusion, option (a) is the worst case, because there is no possibility for the authority to deny an approval only because of a special design. The silent agreement under GRE to grant no approval for a logo is not sustainable in the long run. Thus, more and more vehicles with self-illuminated logos are expected on the road in future. This development of logos without a clear frame could become a road safety issue because the distraction is not put under control (especially because of the logo size). This is the reason why option (a) was rejected.

Option (b)

6. Option (b) may lead to endless discussions between the type approval authorities and manufacturers whether a presented design is a logo or only similar to a logo but slightly different. Option (b) also needs a clear definition of the logo to ensure that there will be no wrong interpretation of what really the logo is, so that to avoid that a lighting device with a slight difference from a well-known logo (e.g., with a small change of the angles of a symmetrical figure) will get type approval, because there is no justification to reject the approval by the technical services and type approval authorities. This is the reason why option (b) was dropped as well.

Option (c)

7. By choosing option (c) and allowing some illuminated logos, subject to very restrictive rules (definition of the logo, size, number, location, symmetry, etc.), discussions, as described above, can be avoided, since no manufacturer wants to have a similar logo but only his own one, which he can prove as such. This establishes a clear threshold for approval that supports the type approval authorities and technical services in their work, which should be in everyone's interest. On the other hand, other logos, for example from automotive suppliers or only for advertising purpose, are automatically forbidden. Thanks to these elements, option (c) is the most appropriate solution for traffic safety.

8. The following principles were discussed with the aim to create a simple compromise solution for allowed logos:

- The definition of a manufacturer logo is added.
- Only the logo of the vehicle manufacturer (included the manufacturer in a multistage vehicle type approval) is allowed. Logos of equipment suppliers are not allowed.
- Logo shall be type approved as being part of the current existing signalling function (i.e. front position lamp, rear position lamp). This means that it is also possible to locate it in a band complying with the requirements of UN Regulation No. 48.
- Location of logo: at the front or at the rear of vehicle.
- Number of logos: in case of lamps incorporating a logo, only two lateral logos (one on each side), or one central logo can be fitted on the rear and on the front of the vehicle **in a very specific and restrictive situation:**
 - **only possible for M₁ and N₁ categories and only incorporated in the approval of a front and/or rear position lamps, because there is no requirement on the distance between the inner edges of the two apparent surfaces, according to paragraphs 6.9.4.1. and 6.10.4.1. of UN Regulation No. 48 (possible through a lamp in a shape of a band, or through an interdependent Y-system);**
 - **a central logo of a public transport company cannot be type approved according to UN Regulation No. 48 because it is not a lighting or light-signalling function as mentioned in paragraph 5.30. For this reason, if there is a need to do so for Contracting Parties, the central logo of a public transport company is like illuminated route numbers and destination signs and has to be solved by national regulations.**
- Size: maximum light-emitting surface of logo: less than 100 cm², so that to avoid being **too distracting, or** considered as lighting advertisement (considering the current existing national laws). **The size corresponds to the visual acuity of the human eye. It can be shown that the detection of a logo as such is restricted only to few traffic situations, mostly in the city at lower speed, where non-luminous logos are visible anyway. An informal document on this issue will be submitted to the eighty-fifth session of GRE.**
- Symmetry: the logo light emitting surface does not have to be symmetrical by itself, considering that the maximum size is smaller than 100 cm².

9. The "logo"-specifications made in the proposal should reduce intentional and increased attention of other road users to an acceptable level. Their distraction should be avoided as much as possible. This is the reason why the stop lamps (even for S1/S2 lamps), direction indicator lamps and reversing lamps should not incorporate a logo for evident safety reasons, as those signals require immediate reactions from others road users and should create no distraction.

10. Based on the outcome of previous discussions, revised draft amendments to UN Regulations Nos. 148 and 48 are now presented in this proposal.