

Proposal for extension of DETA to improve the use of the UNIQUE IDENTIFIER for UN Regulations

On behalf of the WP.29 IWG on DETA

DETA-44-03e Rev.1 (follow-up of DETA-41-06e Rev.1)

Legal Basis / Motivation

Legal Basis: 1958 Agreement Revision 3 Schedule 5:

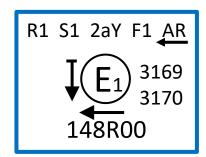
"... the approval markings required by UN Regulations may be replaced by a Unique Identifier (UI) preceded by the symbol (UI), unless specified otherwise in the UN Regulations." (This overrides the mandatory marking in UN Regulations unless specified otherwise)

Device markings (depending on Regulation text):

- Approval marking
- Other marking

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Marking example for lighting & light-signalling Regulations



Approval marking

P21W P21/5W PY21W MD E4 3349

Light sources / modules used in the device



Trademark / Logo of manufacturer

12V

Rated voltage

Motivation / Text of the Regulation (R148, R149, R150)

The (traditional) Approval Marking specifies (Example R148):

- 1. The number of the type approval
- 2. The contracting party (country) who is responsible for the type approval
- 3. The Regulation Number the device was type approved to
- 4. The status of the Regulation at the time of type approval
- 5. The different functions that are included in the device
- 6. Any possible restrictions in mounting height
- 7. Any possible restrictions in mounting position
- 8. Any possible restriction to the number of devices necessary (D or Y)

3170 E1 148R (series) 00 R1 S1 2aY F1 AR ↓ (2a)Y



ALL these markings must be visible after the installation of the device on the vehicle

MAY BE REPLACED BY:

The (new) Unique Identifier Marking specifies:

1. The unique number for accessing the DETA

270650



ALL these markings must be visible after the installation of the device on the vehicle

With the UI, presently required information on the product is no longer present, but is available in DETA to only users with access rights.

Persons without DETA access will get this information via a new "summary document" (see next slides).

Motivation / Reason for the chosen solution

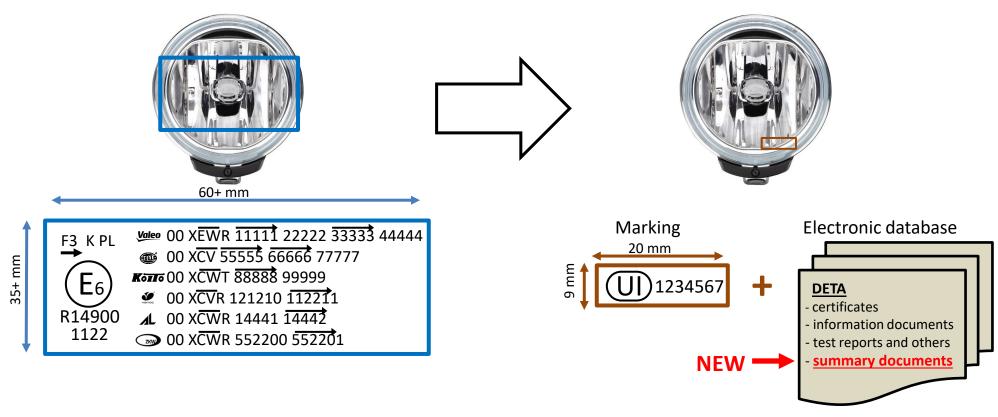
Example: Device used as a beam contributor for different AFS systems

Approval marking

Unique Identifier

(On any fixed part visible after installation i.e. lens)

(On any fixed part visible after installation i.e. lens)



Details of the amendment to DETA

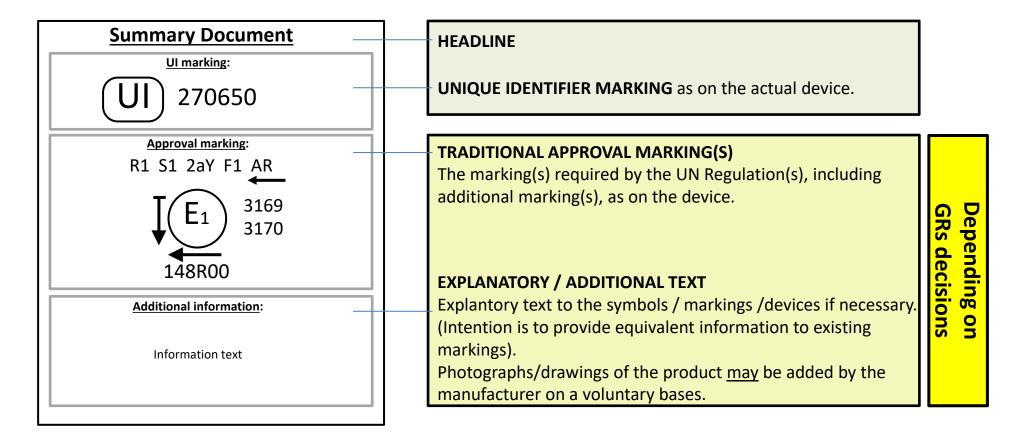
Part A: Document management

- Create a new "Summary Document" in DETA (A4, PDF)
 - showing for example, depending on GRs decisions, for each Regulation:
 - Description
 - Traditional markings (as currently present on the product) / Explanatory text
 - If applicable, restrictions to the installation and/or use of the device

Part B: Usergroup management

- Create a new usergroup in DETA
- Usergroup level: Public (e.g. law enforcement, repair shops, public, etc.)
- Usergroup rights: Read only access to the "Summary Documents"
- The public has only access to the "Summary Documents" stored in DETA via a <u>separate public web portal</u>

Summary document layout



<u>Note</u>: This is an example only. After the GRs feedback is received, a harmonized template will be developed and can be used for supplementing each UN Regulation, where applicable.

The summary document will be supplied by the manufacturer in pdf format on A4 size and uploaded to DETA by the approval authority together with all other approval documentation.

The summary document can be accessed via a public web portal upon entering the UI number.

Considerations for all GRs

For which UN Regulations summary documents need to be considered:

Most UN Regulations do not require any additional markings. For those there is no real advantage of using the UI marking and summary documents will have no added value.



In case a manufacturer applies a UI marking anyway, the UI number can be entered in the public web portal and information on the associated approval number(s), series of amendments and issueing date be obtained from the attributes in DETA.

For all other UN Regulations it should be considered to include a summary document model.

Considerations for all GRs

Summary:

- It is not currently specified which markings are part of the "approval marking";
- by default, the UI marking may replace the "approval marking" on a product and thus some additional information may not be shown on the product anymore;
- the missing information may be made publically available by a summary document in DETA accessible through a public web portal.

All GRs need to consider for each UN Regulation under its responsibility:

- 1. Does a UN Regulation need to prohibit the replacement of the approval marking by a UI marking (as currently for UNR22, 44, 129).
 - Consideration: is the 'E-mark' on the product necessary for consumers.
- 2. Are some of the markings to be considered not part of the "approval marking" and must those remain on the product.
 - Considerations: e.g. is the particular (additional) marking necessary for consumers, or, is the marking unique for that product and cannot be identified from the approval documentation or summary document, like the 'trade name'.
- 3. For all other cases, a Summary Document model and its content may need to be specified (see previous slides) and included in a Supplement to the UN Regulation. (A harmonized template will be developed).