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Eighty-eighth session

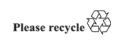
Geneva, 25-28 April 2023 Item 4 of the provisional agenda Simplification of Lighting and Light-Signalling UN Regulations

Revised proposal for a new [09] series of amendments to UN Regulation No. 48

Submitted by the Informal Working Group on Simplification of Lighting and Light-Signalling Regulations*

The text reproduced below was prepared by the Informal Working Group on Simplification of Lighting and Light-Signalling Regulations (IWG SLR) as requested by the Working Party on Lighting and Light-Signalling (GRE) at its eighty-seventh session (ECE/TRANS/WP.29/GRE/87, para. 13 and Annex II). This revised proposal is based on ECE/TRANS/GRE/2020/8/Rev.2 and aims to introduce new requirements for headlamp levelling, in particular on the vertical inclination in relation to the dipped-beam headlamp mounting height, and to allow manual levelling only for off-road vehicles. The modifications to the existing text of the UN Regulation No. 48 are marked in bold for new or strikethrough for deleted characters.

^{*} In accordance with the programme of work of the Inland Transport Committee for 2023 as outlined in proposed programme budget for 2023 (A/77/6 (Sect. 20), table 20.6), 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

Paragraph 6.2.6.1. and related subparagraphs, amend to read:

"6.2.6.1. Vertical **inclination**

6.2.6.1.1. The initial downward inclination of the cut-off of the dipped-beam to be set in the unladen vehicle state with one person in the driver's seat shall be specified within an accuracy of 0.1 per cent by the manufacturer and indicated in a clearly legible and indelible manner on each vehicle close to either headlamp or the manufacturer's plate by the symbol shown in Annex 7.

The value of this indicated downward inclination shall be defined in accordance with paragraph 6.2.6.1.2.

Initial downward inclination

The initial downward inclination of the cut-off of the passing-beam shall be:

- set in the unladen vehicle state with one person in the driver's seat and
- specified within an accuracy of 0.1 per cent by the manufacturer and
- within the range defined in paragraph 6.2.6.1.2.

The value of this specified initial downward inclination shall be indicated in a clearly legible and indelible manner on each vehicle close to either headlamp or the manufacturer's plate by the symbol shown in Annex 7.

Different values of the initial downward inclination for different variants/versions of the same vehicle type may be specified, within the range defined in paragraph 6.2.6.1.2., provided that only the pertinent value is indicated on each variant/version.

6.2.6.1.2. Vertical inclination limits of the cut-off

Depending on the mounting height in meters (h) of the lower edge of the apparent surface in the direction of the reference axis of the dipped-beam headlamp, measured on the unladen vehicles, the vertical inclination of the cutoff of the dipped-beam, starting from the initial downward inclination value set by the vehicle manufacturer as prescribed in paragraph 6.2.6.1.1., shall under all the static conditions of Annex 5, remain between the following limits and the initial aiming shall have the following values:, under all the static loading conditions of Annex 5:

h < 0.8

limits: between -0.5 per cent and -2.5 per cent

initial aiming: between 1.0 per cent and 1.5 per cent

0.8 < h < 1.0

limits: between 0.5 per cent and 2.5 per cent

initial aiming: between 1.0 per cent and 1.5 per cent

or, at the discretion of the manufacturer,

limits: between 1.0 per cent and 3.0 per cent

initial aiming: between 1.5 per cent and 2.0 per cent

The application for the vehicle type approval shall, in this case, contain information as to which of the two alternatives is to be used.

h > 1.0

limits: between 1.0 per cent and 3.0 per cent

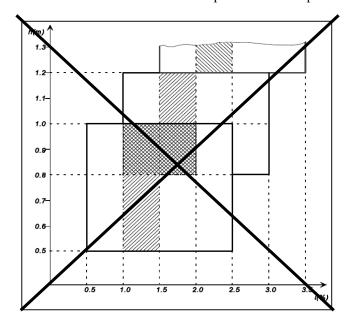
initial aiming: between 1.5 per cent and 2.0 per cent

Mounting height h [m]	Upper inclination limit [per cent]	Lower inclination limit [per cent]
$0.5 \leq h \leq 0.9$	-0.50	- (h + 1.2)
0.9 < h ≤ 1.2	- (h x 2.17 - 1.45)	- (h x 2.17 + 0.15)
1.2 < h ≤ 1.5		

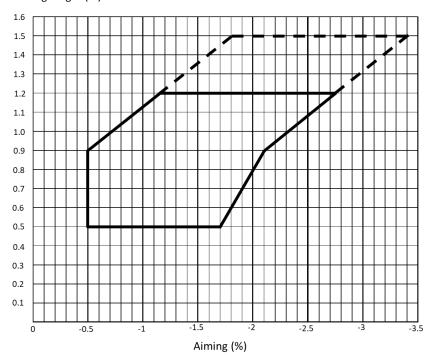
The above limits and the initial aiming values are summarized in the diagram below.

For category N_3G (off road) vehicles, where the headlamps exceed a height of 1,200 mm the limits for the vertical inclination of the cut-off shall be between: -1.5 per cent and -3.5 per cent

The initial aim shall be set between: 2 per cent and 2.5 per cent.



Headlamp mounting height (m)



The area within the dashed line indicates the extension of the aiming diagram only valid for M_2G , M_3G , N_2G , N_3G (off-road) vehicles

Paragraph 6.2.6.2. and related subparagraphs, amend to read:

"6.2.6.2. Headlamp levelling device

6.2.6.2.1. In the case where a headlamp levelling device is necessary to satisfy the requirements of paragraphs 6.2.6.1.1. and 6.2.6.1.2., the device shall be automatic.

6.2.6.2.2. However, devices which are adjusted manually, either continuously or non-continuously, shall only be permitted for vehicles of categories M₂G, M₃G, N₂G, N₃G, provided they have a stop position at which the lamps can be returned to the initial inclination defined in paragraph 6.2.6.1.1. by means of the usual adjusting screws or similar means.

These manually adjustable devices shall be operable from the driver's seat easily visible, reachable and identifiable by the driver in accordance with the requirements of UN Regulation No. 121.

Continually adjustable devices shall have reference marks indicating the loading conditions that require adjustment of the dipped beam.

The number of positions on devices which are not continuously adjustable to adjust the dipped-beam headlamps shall be such as to ensure compliance with the range of values prescribed in paragraph 6.2.6.1.2. in all the loading conditions defined in Annex 5.

For these devices also, the loading conditions of Annex 5 that require adjustment of the dipped beam shall be clearly marked near the control of the device (Annex 8).

Requirements of controls for the headlamps leveling devices are specified in Annex 8.

The different positions to adjust the dipped-beam headlamps shall be explained in the owner's handbook.

6.2.6.2.3. In the event of a failure of devices described prescribed in paragraphs 6.2.6.2.1. and 6.2.6.2.2., the dipped-beam shall not assume a

position in which the dip vertical inclination is less downward than it was at the time when the failure of the device occurred."

Paragraph 6.2.6.3. and related subparagraphs, amend to read:

- "6.2.6.3. Measuring procedure
- 6.2.6.3.1. After adjustment of the initial **downward** inclination, the vertical inclination of the dipped-beam, expressed in per cent, shall be measured in static conditions under all the loading conditions defined in Annex 5.
- 6.2.6.3.2. The measurement of the variation of dipped-beam **downward** inclination as a function of load shall be carried out in accordance with the test procedure set out in Annex 6."

Paragraph 6.2.9.3., amend to read:

"6.2.9.3. With respect to vertical inclination the provisions of paragraph 6.2.6.2.2. above shall not be applied for dipped beam headlamps with a light source or LED module(s) producing the principal dipped beam and having an objective luminous flux which exceeds 2,000 lumens.

In the case of filament lamps for which more than one test voltage is specified, the objective luminous flux which produces the principal dipped-beam, as indicated in the communication form for the type approval of the device, is applied.

In the case of dipped-beam headlamps equipped with an approved light source, the applicable objective luminous flux is the value at the relevant test voltage as given in the relevant data sheet in the Regulation, according to which the applied light source was approved, without taking into account the tolerances to the objective luminous flux specified on this datasheet."

Paragraph 6.22.6.1. and related subparagraphs, amend to read:

"6.22.6.1. Vertical **inclination**:

6.22.6.1.1. The initial downward inclination of the cut-off of the basic passing-beam to be set in the unladen vehicle state with one person in the driver's seat shall be specified within an precision accuracy of 0.1 per cent by the manufacturer and indicated in a clearly legible and indelible manner on each vehicle, close to either the front lighting system or the manufacturer's plate, by the symbol shown in Annex 7.

Where differing initial downward inclinations are specified by the manufacturer for different lighting units that provide or contribute to the cutoff of the basic passing-beam, these values of downward inclination shall be
specified within an precision accuracy of 0.1 per cent by the manufacturer and
indicated in a clearly legible and indelible manner on each vehicle, close to
either the relevant lighting units or on the manufacturer's plate, by the symbol
shown in Annex 7 in such a way that all the lighting units concerned can be
unambiguously identified.

The value(s) of this (these) indicated initial downward inclination(s) shall be specified by the vehicle manufacturer within the range defined in paragraph 6.2.6.1.2. in relation to the mounting height of the lighting units that provide or contribute to the cut-off of the basic passing-beam.

Different values of the initial downward inclination for different variants/versions of the same vehicle type may be specified, within the range defined in paragraph 6.2.6.1.2., provided that only the pertinent value is indicated on each variant/version.

6.22.6.1.2. The downward inclination of the horizontal part of the "cut-off" of the basic passing-beam shall remain between the limits indicated in paragraph 6.2.6.1.2. of this Regulation under all the static loading conditions of the vehicle of

Annex 5 to this Regulation; and the initial aiming shall be within the specified values.

6.22.6.1.2.1. In case the passing-beam is generated by several beams from different lighting units, the **relevant requirements** provisions according to paragraph 6.22.6.1.2. **as** above **indicated** apply to each said beam's "cut-off" (if any), which is designed to project into the angular zone, as indicated under item 9.4. of the communication form conforming to the model in Annex 1 to UN Regulation No. 123 or 149."

Paragraph 6.22.6.2. and related subparagraphs, amend to read:

- "6.22.6.2. Headlamp levelling device
- 6.22.6.2.1. In the case where a headlamp levelling device is necessary to satisfy the requirements of paragraph 6.22.6.1.2., the device shall be automatic.
- 6.22.6.2.2. In the event of a failure of this device, the **basic** passing-beam shall not assume a position in which the dip **vertical inclination** is less **downward** than it was at the time when the failure of the device occurred."

Add a new paragraph 12.8. and related subparagraphs to read:

- "12.8. Transitional provisions applicable to [09] series of amendments.
- 12.8.1. As from the official date of entry into force of the [09] series of amendments, no Contracting Party applying this Regulation shall refuse to grant or refuse to accept type approvals under this Regulation as amended by the [09] series of amendments.
- 12.8.2. For vehicles of categories M_1 and N_1 :
- 12.8.2.1. As from 1 September [2026] Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, first issued after 1 September [2026].
- 12.8.2.2. Until 1 September [2029], Contracting Parties applying this Regulation shall accept type approvals to the preceding series of amendments, first issued before 1 September [2026].
- 12.8.2.3. As from 1 September [2029], Contracting Parties applying this Regulation shall not be obliged to accept type approvals, and extensions thereof, issued to the preceding series of amendments to this Regulation.
- 12.8.3. For vehicles of categories M₂, M₃, N₂ and N₃:
- 12.8.3.1. As from 1 September [2028] Contracting Parties applying this Regulation shall not be obliged to accept type approvals to the preceding series of amendments, first issued after 1 September [2028].
- 12.8.3.2. Until 1 September [2031], Contracting Parties applying this Regulation shall accept type approvals to the preceding series of amendments, first issued before 1 September [2028].
- 12.8.3.3. As from 1 September [2031], Contracting Parties applying this Regulation shall not be obliged to accept type approvals, and extensions thereof, issued to the preceding series of amendments to this Regulation.
- 12.8.4. Notwithstanding the transitional provisions above, Contracting Parties who start to apply this Regulation after the date of entry into force of the most recent series of amendments are not obliged to accept type approvals which were granted in accordance with any of the preceding series of amendments to this Regulation.
- 12.8.5. Notwithstanding paragraphs 12.8.2.3. and 12.8.3.3., Contracting Parties applying this Regulation shall continue to accept type approvals to the preceding series of amendments to this Regulation, for the vehicle types which are not affected by the changes introduced by the [09] series of amendments.

- 12.8.6. Contracting Parties applying this Regulation may grant type approvals according to any preceding series of amendments to this Regulation.
- 12.8.7. Contracting Parties applying this Regulation shall continue to grant extensions of existing approvals to any preceding series of amendments to this Regulation."

Annex 2, amend to read:

"Arrangements of approval marks

Model A

(See paragraph 4.4. of this UN Regulation)

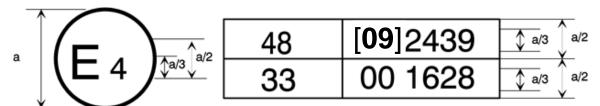


a = 8 mm min.

The above approval mark affixed to a vehicle shows that the vehicle type concerned has, with regard to the installation of lighting and light-signalling devices, been approved in the Netherlands (E 4) pursuant to **UN** Regulation No. 48 as amended by the **[09]** series of amendments. The approval number indicates that the approval was granted in accordance with the requirements of **UN** Regulation No. 48 as amended by the **[09]** series of amendments.

Model B

(See paragraph 4.5. of this UN Regulation)



a = 8 mm min.

The above approval mark affixed to a vehicle shows that the vehicle type concerned has been approved in the Netherlands (E 4) pursuant to **UN** Regulation No. 48 as amended by the **[09]** series of amendments and **UN** Regulation No. 33.¹ The approval number indicates that, at the dates when the respective approvals were given, **UN** Regulation No. 48 was amended by the **[09]** series of amendments and **UN** Regulation No. 33 was still in its original form."

¹ The second number is given merely as an example.

Annex 8, amend to read:

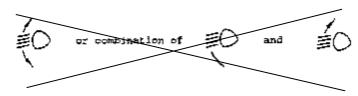
"The controls for the headlamp-levelling devices referred to in paragraph 6.2.6.2.2. of this Regulation

- 1. Specifications
- 1.1. Downward-Inclination of the dipped-beam shall in all cases be produced by a simple control, the operation of which is clearly described in the owner's handbook. in one of the following ways:
 - (a) by moving a control downwards or to the left;
 - (b) by rotating a control in a counter clockwise direction;
 - (c) by depressing a button (push pull control).

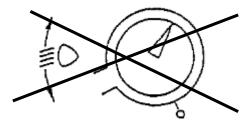
If several buttons are used to adjust the beam, the button which gives the greatest downward inclination shall be installed to the left or below the button(s) for other dipped-beam positions.

A rotary control that is installed edge-on, or with only the edge visible, should follow the operating principles of control of types (a) or (c).

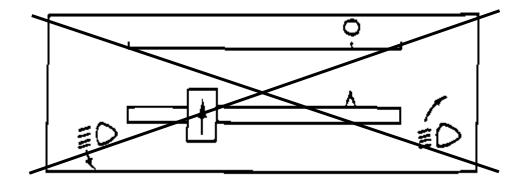
- 1.1.1. This control shall carry symbol(s) indicating clearly the movements corresponding to the downward and upward inclination of the dipped-beam.
- 1.2. The "0" position corresponds to the initial inclination according to paragraph 6.2.6.1.1. of this Regulation.
- 1.3. The "0" position which, according to paragraph 6.2.6.2.2. of this Regulation has to be a "stop position", need not necessarily be at the end of the scale.
- 1.4. The marks used on control shall be explained in the owner's handbook.
- 1.5. Only the following symbols may be used to identify the controls:



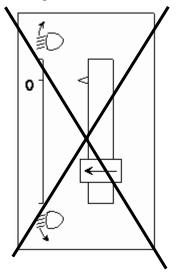
Symbols employing five lines instead of four may also be used **Example 1:**



Example 2:



Example 3:



Annex 9, paragraph 1.3.2., amend to read:

"1.3.2. Variation of inclination with load

The variation of the dipped-beam downward inclination as a function of the loading conditions specified within this section shall remain within the range:

0.2 per cent to 2.8 per cent for headlamp mounting height h < 0.8;

0.2 per cent to 2.8 per cent for headlamp mounting height $0.8 \le h \le 1.0$;

or

0.7 per cent to 3.3 per cent (according to the aiming range chosen by the manufacturer at the approval);

0.7 per cent to 3.3 per cent for headlamp mounting height $1.0 < h \le 1.2$ m;

1.2 per cent to 3.8 per cent for headlamp mounting height h > 1.2 m.

Mounting height h [m]	Upper inclination limit [per cent]	Lower inclination limit [per cent]
$0.5 \le h \le 0.9$	-0.50	- (h + 1.2)
0.9 < h ≤ 1.2	- (h x 2.17 - 1.45)	- (h x 2.17 + 0.15)
1.2 < h ≤ 1.5		

In the case of a class "F3" front fog lamp with (a) light source(s) having a total objective luminous flux which exceeds 2,000 lumens, the variation of the downward inclination as a function of the loading conditions specified within this section shall remain within the range:

0.7 per cent to 3.3 per cent for front fog lamp mounting height $h \le 0.8$;

1.2 per cent to 3.8 per cent for front fog lamp mounting height h > 0.8 m.

 $h \le 0.8$: 0.7 per cent minimum vertical inclination and 3.3 per cent maximum vertical inclination;

h > 0.8: 1.2 per cent minimum vertical inclination and 3.8 per cent maximum vertical inclination.

The states of loading to be used shall be as follows, as indicated in Annex 5 of this Regulation, for every system adjusted accordingly."

II. Justification

A. General

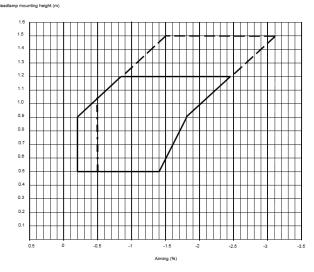
- 1. The Informal Working Group on Visibility, Glare and Levelling (IWG VGL) was established at the seventy-fourth session of GRE in October 2015. Its first task was to "define technology neutral requirements, as instructed by WP.29, in particular to find a general solution for glare and visibility issues, and to review all levelling requirements" (ECE/TRANS/WP.29/GRE/74, Annex III).
- 2. This proposal is based on the concepts finally agreed at the tenth meeting of IWG VGL. The main technical changes apply to paragraph 6.2.6. and related sub-paragraphs for the dipped-beam headlamps vertical inclination. The corresponding paragraph 6.22.6.1. and related sub-paragraphs for the adaptive front-lighting systems (AFS) dipped-beam vertical inclination have been changed accordingly. Due to the basic changes agreed by IWG VGL, also some other paragraphs needed to be changed or added.
- 3. GRE, at its seventy-ninth session, decided that elements of the objectives of IWG VGL (ECE/TRANS/WP.29/GRE/76, Annex III) would be transferred to IWG SLR, in order to avoid duplication of work and since both groups had converging goals (ECE/TRANS/WP.29/GRE/79, para. 31).
- 4. As indicated in its adopted Terms of Reference (ECE/TRANS/WP.29/GRE/79, Annex II), IWG SLR shall take over and consider the outcome of IWG VGL (based on the discussion document GRE-79-29) as recommended at the seventy-ninth session of GRE (ECE/TRANS/WP.29/GRE/79, para. 31).
- 5. IWG SLR, at its twenty-seventh session, considered informal document GRE-79-29 and decided to submit it without modifications to the eighty-first GRE session for comments (ECE/TRANS/WP.29/GRE/2019/3).
- 6. Following an in-depth consideration during the eighty-first GRE session, GRE agreed on a modified diagram (GRE-81-21 and Annex II) and requested IWG SLR to prepare, on the basis of the new diagram, a revised proposal for consideration at the next session (ECE/TRANS/WP.29/GRE/81, para. 10).
- 7. IWG SLR, in line with the GRE request, submitted to the eighty-second GRE session a revised proposal (GRE-82-25) which has been extensively discussed during the meeting. Eventually GRE requested IWG SLR to prepare a revised document for the next session, taking into account the comments made at the eighty-second GRE session (ECE/TRANS/WP.29/GRE/82, para. 31).
- 8. IWG SLR, as requested by GRE following the discussions at GRE-83, submitted a revised proposal (ECE/TRANS/WP.29/GRE/2020/8/Rev.2) to GRE-84. GRE noted diverging positions on the proposed aiming diagram and manual levelling for off-road vehicles and instructed SLR to prepare a revised proposal (ECE/TRANS/WP.29/GRE/84,

paras. 14-15). Discussions continued during the 85th and 86th GRE sessions without reaching consensus on the aiming diagram.

9. GRE, at its 87th session, agreed on a new aiming diagram and requested SLR to prepare a final proposal for the 88th session (ECE/TRANS/WP.29/GRE/87, para. 13).

B. Detailed technical explanations

- 10. Paragraph 6.2.6.1.1., which provides the requirements for initial downward inclination, has been rearranged to improve readability.
- 11. For the initial downward inclination, the proposal also gives a possibility of defining different values of initial downward inclination for different variants/versions of the same vehicle type. As the new requirements for the vertical inclination according to the installation are more stringent, it will allow all variants/versions of the same vehicle type to meet these provisions.
- 12. The titles of sub-paragraphs 6.2.6.1.1. and 6.2.6.1.2. are added for clarification, namely 6.2.6.1.1. "Initial downward inclination" and 6.2.6.1.2. "Vertical inclination limits of the cut-off".
- 13. Paragraph 6.2.6.1.2. describes the new requirements for the vertical inclination limits of the cut-off, the provisions of which have been reorganised to improve readability. The vertical inclination values according to the installation height are presented in a table, by means of formula. A new diagram has been inserted providing an illustration of the requirements (aiming in per cent on the horizontal axis and headlamp mounting height in meters on the vertical axis).
- 14. Explanations of the lines in the previous diagram (ECE/TRANS/WP.29/GRE/2020/8/Rev.2) are given below.



15. The vertical line on the left was initially defined at 0 per cent and derived from the GTB study based on the "Klettwitz study" (informal document GRE-71-32). However, some Contracting Parties were reluctant to have the horizontal cut-off with no downward inclination. At its seventy-eighth session, GRE experts decided to keep the previous vertical limit of - 0.2 per cent. However, at its eighty-seventh session, in order to further mitigate potential glare, GRE finally agreed to set the vertical limit at - 0.5 per cent as indicated in the diagram below:

Headlamp mounting height (m)

0.6 0.5 0.4 0.3

1.6 1.5 1.4 1.3 1.2 1.1 1.0 0.9 0.8

0.5 -1 -1.5 -2 -2.5 -3 .;
Aiming (%)

- 16. The inclined line on the left (starting from 0.9 m* in height), initially resulted from a mathematical calculation based on the position of the oncoming driver's eyes (at 0.94 m high) for headlamps up to a height of 1.2 m, measured at a distance of 25 m and with an initial aim of 1 per cent down. Using this calculation, it is possible to increase the inclination proportionally to the installation height and still guarantee that glare remains under control; the cut-off line will always stay under 0.94 m at 25 m distance (for background information, see document VGL-10-03, sheet 13).
- * Note: Initially defined at a height of 0.95 m, it was rounded down to 0.9 m.
- 17. In addition, the line on the left side of the diagram was extended from a height of 1.2 m to 1.5 m in spite of the fact that, during the Klettwitz tests, no vehicles of categories $M_2/M_3/N_2/N_3$ were tested.
- 18. To cover all possible cases of a same type of vehicle (aiming tolerances / chassis deviation / cut-off-line stability / tyre deviation / full or empty tank / levelling device), a range of 1.6 per cent was agreed (see a survey of the International Organization of Motor Vehicle Manufacturers (OICA), document VGL-10-10) and used to define the right-hand limit and the point (-2.1 / 0.9), based on line defined in item 16.
- 19. Starting from 0.9 m high, the range of 1.6 per cent is applied to define the line on the right side of the diagram and up to 1.5m.
- 20. On the right side, under 0.9 m high, there was a compromise to reduce the range progressively to -1.7 per cent at a height of 0.5 m.
- 21. The paragraph 6.2.6.2.2. (containing the requirements for manual levelling devices) is proposed to be amended to allow manual levelling only for off-road vehicles (M_2G , M_3G , N_2G , N_3G). Vehicles used for special purposes are usually equipped with a steel suspension at the front and rear axles. Placement of the sensor in the suitable location on the vehicle is critical for the operation of the system, this position is difficult to protect against mud and spray water (see figures below). For vehicles operating in a very harsh environment adding sensors for automatic levelling systems is a reliability risk. Finding usable positions for the sensors with the different vehicle configurations is not always possible.

FigureExamples where the position of the sensor may be affected by mud and water







- 22. Initially, the outcome of the SLR special session on 12 January 2021 was to keep the additional HMI requirements proposed in square brackets (see GRE/2020/8/Rev.2), as no consensus could be reached at that time (see report SLR-HL-13). Eventually, during SLR-59 it was agreed to remove the text in square brackets (as reflected in this document), since manual levelling will only be allowed for off-road vehicles and the relatively small number of these vehicles is not pertinent to the main concerns relating to glare.
- 23. Improvements to ergonomics
- To become technologically neutral there is no necessity to distinguish between continuously and non-continuously adjustment devices.
- To improve the ergonomics / accessibility of controls, paragraph 6.2.6.2.2. introduces requirements that manually adjustable devices shall be easily visible, reachable and identifiable by the driver in accordance with the requirements of UN Regulation No. 121.
- 24. Amendments to paragraphs 6.2.6.2.3. and 6.2.6.3. (including its sub-paragraphs) are only clarifications of the existing requirements.
- 25. In this proposal, the first sentence in paragraph 6.2.9.3. mandating automatic levelling device in case of objective luminous flux exceeding 2,000 lm is deleted. This requirement is recognized neither performance based nor technologically neutral, as suggested by IWG VGL (informal document GRE-78-32).
- 26. Furthermore, an editorial correction is done in paragraph 6.2.9.3. by adding 'passing-beam'.
- 27. The paragraph 6.22.6.1.1. dealing with provisions for initial downward inclination for Adaptive Front lighting System (AFS) is also amended. As for the passing-beam (dippedbeam) headlamps, this value shall meet the same requirements and values for different variants/versions of the same vehicle type.
- 28. Editorial corrections and clarifications are made in paragraphs 6.22.6.1.2., 6.22.6.1.2.1. and 6.22.6.2.2.

- 29. Longer transitional provisions for vehicle categories N_2 , N_3 , M_2 , M_3 are proposed for the following reasons:
- Automatic levelling for light passenger cars is already well established and can more easily be extended to cover all types of M₁ and N₁ vehicles.
- Trucks are built in much lower volumes than light passenger vehicles and are configured according to each customer order.
- The majority of N₂ and N₃ vehicles utilise mechanical (leaf spring) suspension systems on their front axle(s). Whilst some do use air suspension systems at the rear, the large tyre and suspension deflection, as well changed chassis inclination, can make automatic levelling impossible to achieve.
- Trucks operate in much more harsh environments than light passenger vehicles.
- As load carrying vehicles, N₂ and N₃ vehicles are designed and need to operate at a range of weights. In some instances, the maximum laden weight can up to three times the unladen weight (e.g. tankers, buses etc.). Their centre of gravity can also vary considerably.
- Reliability of automatic levelling systems on these heavy vehicles will be key. We would not wish to see an increase in failures or improper fixes on the road.
- Trucks and buses typically have a much greater lifecycle than passenger cars (e.g. 10 years compared with 6 years respectively).
- The words "and extensions thereof" have been added to paragraphs 12.8.2.3. and 12.8.3.3., for clarification, to avoid different interpretations of the conditions. This is a specific request received from the expert from the European Commission.
- 30. Some editorial corrections are made to Annex 2 (Arrangements of approval marks).
- 31. Changes to Annex 8 are proposed:
- 'Downward' should be deleted. In the old text it is referring to the direction of the control device. For trucks dipped-beams are adjusted both upwards and downwards, due to different loading characteristics of different vehicle configurations.
- In order for the requirements to be technology neutral, the prescriptions of control methods (downwards, rotary, push-pull) have been deleted.
- The requirement in para. 1.3., referring to the owner's handbook, has been moved into the main regulatory text (see paragraph 6.2.6.2.2.) and therefore can be deleted.
- The requirement in para. 1.4., specifying the symbols that can be used, has been deleted as these are already prescribed in UN Regulation No. 121.
- Examples of controls 1, 2 and 3 have been deleted, as the illustrations are considered outdated.
- 32. In Annex 9 (Conformity of Production), paragraph 1.3.2., containing the requirements for the variation of inclination with load, is amended to align with the new provisions of paragraph 6.2.6.1.2. There are no additional tolerances for control of conformity of production, as decided at the thirty-fifth session of IWG SLR in December 2019.

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