



**Economic and Social
Council**

Distr.
GENERAL

TRANS/WP.29/GRRF/2004/16
5 July 2004

ENGLISH
Original: ENGLISH
ENGLISH AND FRENCH ONLY

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

World Forum for Harmonization of Vehicle Regulations (WP.29)

Working Party on Brakes and Running Gear (GRRF)

(Fifty-sixth session, 20-22 September 2004,
agenda item 1.1.)

**COMMENTS ON THE PROPOSALS FOR DRAFT AMENDMENTS TO
REGULATIONS Nos. 13 and 13H**

(Braking and harmonized braking)

Transmitted by the expert from the Russian Federation

Note: The text reproduced below was transmitted by the expert from the Russian Federation at the one-hundred-and-thirty-third session of WP.29 as informal document No. WP.29-133-18. WP.29 agreed to transmit it to GRRF for consideration (TRANS/WP.29/1016, para. 64).

Note: This document is distributed to the Experts on Brakes and Running Gear only.

GE.04-22287

Comments in regard to:

- Proposal for draft supplement 10 to the 09 series of amendments to Regulation No. 13

(document TRANS/WP.29/2004/38);

Proposal for draft supplement 3 to Regulation No. 13-H

(document TRANS/WP.29/2004/40)

Taking into account that the above-mentioned documents were adopted by GRRF and not having objections concerning their contents, the Russian Federation considers it necessary to draw the attention of WP.29 to the certain inconsistency of the proposal for draft supplement 10 to the 09 series of amendments to Regulation No. 13 (document TRANS/WP.29/2004/38).

The proposal concerns generation of a signal to illuminate the stop lamps. According to the draft proposal, in case of endurance braking system, such a signal may be suppressed when the retardation generated is less than 2.2 m/s^2 (paragraph 5.2.1.30.2.2.), and in case of "automatically commanded braking" a signal may be suppressed when the retardation generated is less than 0.7 m/s^2 (paragraph 5.2.1.30.3.). The similar provision is proposed to be included into the Regulation No. 13-H (TRANS/WP.29/2004/40).

In spite of the fact that the said systems differ functionally and are used on vehicles of different categories, in the opinion of the Russian Federation, the retardation levels at which the generated signal causes illumination of the stop lamps have to be equal for any kind of system being used for reducing of vehicle speed.

Perhaps the solution has to be considered together with the issue of equipping of vehicles by the so-called "informative braking signalling systems" that change the intensity of illumination depending on the level of retardation. In this regard, the Russian Federation wishes to draw attention to informal document No. GRE-52-35/Corr.1, transmitted by the Russian Federation at the fifty-second session of GRE regarding the research performed on the subject.

For this reason, the Russian Federation proposes to WP.29 to return to consideration of an issue of algorithm of switching on and informative ability of stop lamps by GRRF and GRE, which, probably, should establish an informal group.
