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Working Party on Lighting and Light-Signalling (GRE)

(Fifty-first session, 15-19 September 2003,
agenda item 1.3.4.)

DENIAL CONCERNING THE TYPE APPROVAL OF
FRONT FOG LAMPS OF THE SEALED BEAM TYPE

relating to Regulation No. 19 (Front fog lamps)

Transmitted by the expert from the Working Party "Brussels 1952" (GTB)

Note: The text reproduced below was prepared by the expert from GTB, in order to clarify its position with regard to the type approval of front fog lamps of the sealed beam type.

Note: This document is distributed to the Experts on Lighting and Light-Signalling only.

Regulation No. 19 - Front fog lamps

Subject: Front Fog Lamps of the sealed beam type

Regulation No. 19 - Front fog lamps was drafted by GTB in 1967. It was approved by WP.29 at its thirtieth session in March 1970, and entered into force on first March 1971.

Since then, the text of Regulation No. 19, which presently exists as Revision 3, has been updated regarding test procedures and additional tests as well administrative provisions. The principal photometric requirements have largely remained unchanged.

In 1997, GTB initiated studies to adapt Regulation No. 19 to technical progress, taking into consideration the advanced state of lighting and headlamp technology. During this process it was considered desirable to harmonize the new proposals as closely as possible with relevant standards existing or being prepared in the United States. The present state of work can be described as follows:

1. Regulation No. 19 will be revised to align the technical substance with SAE standard J583 of April 2001, actual lighting performance being substantially the same;
2. A new Regulation on front fog lamps is being established which takes into account scientific and engineering developments, in particular with regard to road illumination and glare avoidance; this will be accompanied by a proposal for amendments to Regulation No. 48 to ensure correct installation and aiming.

During review of the existing text GTB has encountered an issue which may have legal and technical implications affecting the application of the Regulation by Contracting Parties to the 1958 Agreement: According to paragraph 2.2.1. the application for type approval of a front fog lamp shall be accompanied by "... a brief technical description. If the device is not of the sealed-beam type, the category of filament lamp(s) shall be specified; it shall be"

Discussion in GTB has shown that there may be interpretations of this paragraph which would permit front fog lamps of the sealed-beam type or even with light sources other than filament lamps or with non-replaceable light sources. On the other hand, an interpretation based on the history of Regulation No. 19 tends to conclude that it was never intended to permit light sources other than filament lamps for front fog lamps.

At its ninety-fifth session in May 2003, GTB came to the conclusion that, in the revised version of Regulation No. 19,

- different interpretations of the Regulation should be excluded;
- reference to the sealed-beam type would therefore be deleted.

It was also recommended that, during the time period until the entry into force of the revised version of Regulation No. 19, means should be found to avoid different interpretations which could lead to a distortion in competition and be counterproductive with regard to replacement of light sources.

GTB therefore would like to request GRE to propose and support an agreement where Contracting Parties applying Regulation No. 19 would engage not to grant new type approvals for front fog lamps of the sealed beam type.
