

Proposal for Supplement 16 to Regulation No. 38

This proposed amendment is submitted by the expert from INDIA, in order to amend the requirements for rear fog lamp, if it is grouped with stop lamp.

The modifications are marked in bold characters.

A. PROPOSAL

Add a new paragraph 5.3:

5.3 In case rear fog lamp is grouped with stop lamp, the distance between the rear fog lamp and each stop lamp must be greater than 100 mm.

Re number the existing paragraph 5.3 as 5.4

5.4 Light source module

.....

B. JUSTIFICATION

These requirements are already defined in ECE R 48. It is proposed that these may be specified in ECE R 38 also for the cases where rear fog lamp is grouped with stop lamp.

- There are designs being used today, where the rear fog lamp is grouped with the stop lamp. Some of such examples are shown in the attached pictures.
- Considering today's design concept, generally, more complex and having close tolerances, it is very difficult to verify this requirement on the installation of devices.
- Verification of separation distance in such cases is **much simpler to carry out on the device directly** while approving the device for compliance to ECE R 38, rather than when mounted on a vehicle.
- The proposed amendment will avoid a re-verification during physical verification for compliance of the motor vehicle to ECE R 48.

Examples for Rear Fog Lamp grouped with Stop Lamp

