

OICA comments to ECE/TRANS/WP.29/2011/99 (Draft Supplement 8 to the 04 Series of Amendments of UN Regulation No. 48)

OICA herewith wishes to confirm its doubts as to the cost benefit of ECE/TRANS/WP.29/2011/99 which aims at mandating the installation of automatic headlamp levelling.

Notwithstanding the outcome of the WP.29 discussions on this issue, OICA however expresses its strong support for document ECE/TRANS/WP.29/2011/99/Corr.1 for the following reasons:

1. Although originally foreseen to become the 06 series of amendments to UN Regulation No. 48 (see ECE/TRANS/WP29/GRE/65, § 17), AC.2 and WP.29 in their June 2011 sessions suggested that this proposal on automatic headlamp levelling should become a supplement to UN Regulation No. 48, taking into account the 90 months transitional provisions which could possibly conflict with later series of amendments (see ECE/TRANS/WP29/1091, §10: "WP.29/AC.2 recommended transmitting the proposal adopted by GRE as a Supplement to the current series of amendments for consideration by WP.29 and by the Administrative Committee of the 1958 Agreement (AC.1) at their November 2011 sessions instead of a new series of amendments that could interfere with new series of amendments adopted during the 90 month transitional period")
 2. Basically, the proposal mandates automatic levelling. In addition to the serious doubts as to the cost-effectiveness of such new additional requirements, OICA also has comments to the proposed administrative process.
 3. It should be noted that the 05 series of amendments are a current series, with application dates starting in 2015, in other words well before the application date of mandatory automatic headlamp levelling.
 4. On the other hand, linking the proposal to the 04 series of amendments would in fact conflict with the earlier application dates of the 05 series of amendments.
 5. Even though the transitional provisions should in principle avoid major difficulties, OICA believes that, for the sake of "quality of rulemaking", and in order to avoid administrative interpretation difficulties, the proposal must become a Supplement to the existing latest series, namely the 05 series.
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