

**INDIA'S COMMENTS ON DOCUMENT NO. WP.29/2006/74**

**General comment:**

India understands that while preparing the GTR, it becomes necessary to incorporate the most stringent requirements existing in the regional regulations of each CP. However, India suggests that in some places alternative procedures may be incorporated for CP to choose from. This provides flexibility for the CPs to adopt the GTR in a most cost effective way to suit its conditions.

This is possible under 1998 agreement and has been resorted to many GTR's for example GTR 2 and GTR 9.

**India's views on IMMA proposal are as given below:**

<b>Item</b>	<b>Source</b>	<b>IMMA Proposal</b>	
<b>No.</b>	<b>Contents</b>	<b>GTR</b>	<b>Comments</b>
<b>Subject</b>	<b>Contents</b>	Motorcycle Controls, Displays and Symbols	No comments, subject to correction, if need be, based on the decision of Vehicle application.
<b>Vehicle Application</b>	<b>Contents</b>	Motorcycles used on Public Roads	India suggests that categories 3-1, 3-2, 3-3, 3-4 and 3-5 as defined in SR.1 may be included in the scope.  India understand that the base document, summary of which is tabulated do not cover 3-wheeled vehicle (3-2 and 3-5).  India considers inclusion of 3 wheeled vehicles (with handle bar or steering wheel) in the GTR as India and

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			<p>developing countries have 3 wheeled vehicles in good quantities. Moreover, there are 3 wheelers operating on different fuels requiring additional tell tales.</p> <p>If it is agreed to extend the scope for 3 wheelers, India would provide the draft inputs.</p>
<b>General Requirements</b>	<b>Contents</b>	<p>Controls used during normal operations shall be within the operator's reach while in the normal operating position. Controls on the handlebars shall be placed so that when used, the operator's hand does not leave the respective handgrip. Symbols or displays for controls viewed by the operator while in the normal operating position shall stand out clearly against the background, either bright against dark or dark against bright. Symbols must be placed on or adjacent to the control or display to be identified. Where this is not possible, the symbol and the control or display must be joined by a continuous line as short as possible.</p>	<p>India suggest that, the sentence in IMMA proposal, “Symbols or displays for controls viewed by the operator while in the normal operating position shall stand out clearly against the background, either bright against dark or dark against bright” may be replaced by “Symbols on controls and tell-tales shall have a good contrast with their background”. <i>This is as per ISO.</i></p>
<b>Colour of Tell-Tale Lights</b>	<b>Contents</b>	<p>Red: Danger Amber: Caution Green: Safe or In Use Blue: Driving or upper headlight beam only</p>	India has no comments.

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<b>Symbols</b>		If a symbol is used, it's harmonized with ISO 6727	Presume reference to ISO is only for information, since all symbols have been defined subsequently. <i>Also, symbols as per ISO 2575 should be referred.</i>
<b>Supplemental Engine Stop Control</b>	<b>Contents</b>	Located on the right handlebar, represented by given words and/or symbols for "off " and "on" or "run" positions.	May be kept optional. <i>Supplemental Engine Stop Control is not mandatory in Europe, Japan, ECE regulation and India.</i>
<b>Ignition Switch</b>	<b>Contents</b>	Definition: Ignition Switch - The device that enables the engine to run, and may also allow operation of other electrical systems on a vehicle. For a rotary control, the "on" position shall be clockwise from the "off" position.	India has no comments.
<b>Electric Starter</b>		Represented by a given symbol.	India has no comments.
<b>Manual Choke</b>		Represented either by the symbol on the control or an optional amber tell-tale with the symbol.	India has no comments
<b>Fuel Tank Shutoff Valve</b>	<b>Source</b>		
<b>Manual</b>	<b>Contents</b>	If so equipped, the "on" position shall be separated from the "off" position by 90 degrees of rotation. If equipped with a "reserve"	Needs to be reviewed for 3 wheelers. In addition, it may be necessary to clarify that the fuel cut of system for the engine stop function in case of

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		position, it shall be separated from the "on" position by 180 degrees of rotation and the operator shall be able to switch to the "reserve" position while in the normal driving position. Optional: the switch may be represented by the words "On" "Off" and "Reserve" (or "Res" or "Res."), or by the given symbols.	diesel engine should not be confused with fuel tank shut off control.
	<b>Symbol</b>	Reserve or Res. orRes	
<b>Automatic</b>	<b>Contents</b>	<p>Fuel shut-off control optional for systems in which the fuel flow is stopped when the engine is switched off. If equipped with a control, the symbols and control positions shall be the same as identified for Manual Fuel Shut-Off Control. No "Off" position is required. The control may include a "Prime" position which shall not conflict with any other defined position and shall be marked with the "PRI":</p> <p><b>There is currently no symbol for the "Prime" function. A new appropriate symbol could be discussed as a future work item, eg in ISO, etc.</b></p>	

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<b>Speedometer</b>	<b>Source</b>		
	<b>Contents</b>	The speedometer display must be located within the direct field of view of the driver and shall be legible day or night.	India has no comments.
<b>Horn</b>	<b>Source</b>		
	<b>Contents</b>	Represented by a given symbol, located on the left handlebar for vehicles with foot operated gear selection operated independently of the clutch and on the right handlebar for vehicles with gear selection operated in conjunction with the clutch.	<i>IMMA proposal is based on ECE. In Europe, Japan and India, location of the horn switch is permitted either on left or right side of the handle bar. It is suggested that the Horn control may be located on left side or right side of the handle bar.</i>
<b>Head lamp control</b>	<b>Contents</b>	Located on the left handlebar for vehicles with gear selection operated independently of a hand operated clutch, on right handlebar for vehicles with gear selection is operated in conjunction with the hand operated clutch. Represented by given symbols for driving beam headlamp and passing beam headlamp. An indicator lamp shall show when the driving beam is in use.	<i>IMMA proposal is based on ECE. In Europe, Japan and India, location of the headlamp switch is permitted either on left or right side of the handle bar. It is suggested that the Headlamp control may be located on left side or right side of the handle bar.</i>
	<b>Lights Symbol</b>	Passing Beam	

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<b>No.</b>	<b>Contents</b>	<b>GTR</b>	<b>Comments</b>
		Driving beam	
	<b>Colour of tell-tale</b>	Driving or High Beam: Blue. Optional: Passing or Low Beam: Green.	
<b>Optical Warning Device</b>	<b>Source</b>		
	<b>Contents</b>	If so equipped, the control for this device shall be located on the same handlebar as the vehicle Driving Beam/Passing Beam Switch.	India presumes that, the optical warning device is only for flashing of the headlamp to give a signal to the driver of another vehicle.
<b>Fog Lamps</b>	<b>Source</b>		
	<b>Contents</b>	Represented by given symbols for front and rear fog lamps. If one control is used for both, front fog lamp symbol is used.	
	<b>Symbol</b>	Rear	

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<b>No.</b>	<b>Contents</b>	<b>GTR</b>	<b>Comments</b>
		Front	
	<b>Colour of tell-tale</b>	Front: Green. Rear: Amber. If one lamp is used for both: Green.	
<b>Signal</b>	<b>Source</b>		
	<b>Contents</b>	Represented by given symbols. The left and right arrows on switches or tell-tales may be separated. Switch is to be located on the handlebar in clear view from the operator's seat and shall be marked clearly. The indicator lamp must be located within the clear view of the operator when the vehicle is in operation and may either flash to show that a turn signal is engaged or separate lamps may flash to show which side of the vehicle is being worked. If there are separate tell-tales, or controls, for the left and right direction indicators, the two arrows may also be used separately.	India has no comments.
	<b>Colour of tell-tale</b>	Green	
<b>Hazard</b>	<b>Source</b>		

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<b>Warning Light</b>			
	<b>Contents</b>	Represented by either the turn signal indicator lamp(s) flashing simultaneously, or by a given triangle symbol.	India has no comments.
	<b>Symbol</b>	1. If the tell-tale for a turn signal is the separate, individual arrow (not both arrows), the hazard warning tell-tale may be the simultaneous operation of both turn signal tell-tales  or  2.	India has no comments.
	<b>Colour of tell-tale</b>	1. Green 2. Red	
<b>Lighting Control Switch</b>	<b>Source</b>		
	<b>Contents</b>	Can be combined with ignition control. Represented by the given symbols for position lamps, master lamp switch and parking lamp but	India has no comments.



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		if all lamps are automatically lit when vehicle is in operation, no position or master lamp switch symbol need appear. Clockwise operation if rotary switch, position lights then headlights.	
	<b>Source</b>	Position lamp	
	<b>symbol</b>	Parking Lamp  Master Lamp switch	
	<b>Colour of tell-tale</b>	Tell-Tale Optional: Green	
<b>Fuel Indicator</b>	<b>Source</b>		
	<b>Contents</b>	(Indicator optional) Represented by a given symbol.	
	<b>Colour of tell-tale</b>	If so equipped: Amber	

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<b>No.</b>	<b>Contents</b>	<b>GTR</b>	<b>Comments</b>
<b>Engine Cooling Temp</b>	<b>Source</b>		
	<b>Contents</b>	(Indicator Optional) Represented by a given symbol.	
	<b>Colour of tell-tale</b>	If so equipped: Red	
<b>Battery Charging</b>	<b>Source</b>		
	<b>Contents</b>	(Indicator Optional) Represented by a given symbol.	
	<b>Colour of tell-tale</b>	If so equipped: Red	
<b>Engine Oil</b>	<b>Source</b>		
	<b>Contents</b>	Represented by a given symbol.	
	<b>Colour of tell-tale</b>	Red	
<b>Speed Control</b>	<b>Source</b>		

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<b>No.</b>	<b>Contents</b>	<b>GTR</b>	<b>Comments</b>
	<b>Contents</b>	Rotating handgrip on the right handlebar. Anticlockwise manipulation increases speed. The control shall be self-closing to idle in a clockwise direction after release of the hand unless a speed control device is activated.	India has no comments
<b>Front Wheel Brake</b>	<b>Source</b>		
	<b>Contents</b>	Hand lever located on the right handlebar. However, in the case of vehicles equipped with a combined brake system, the front wheel brake may operate simultaneously with the rear wheel brake when the combined brake system is activated.	India has no comments.
<b>Rear Wheel Brake</b>	<b>Source</b>		
<b>Foot Rear Wheel Brake Control</b>	<b>Contents</b>	For L1 - L5 category vehicles EXCEPT L1 category vehicles with pedals usable for motive power [mopeds with bicycle type pedals].  A foot control located on the right side of the frame.	Categories to be aligned with SR.1

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		Not allowed for L1 category vehicles with pedals usable for motive power.	
<b>Hand Rear Wheel Brake Control</b>	<b>Contents</b>	For L1 - L5 category vehicles WITHOUT hand operated clutch devices:  A hand control on the left handlebar.  Not allowed for vehicles with hand operated clutch.	Categories to be aligned with SR.1
	<b>Contents</b>	For L1 - L5 category vehicles equipped with combined braking systems:  The rear wheel brake may operate simultaneously with the front wheel brake when the combined brake system is activated.	Categories to be aligned with SR.1
<b>Parking Brake</b>	<b>Source</b>		
	<b>Contents</b>	(Optional for three wheeled motorcycles or sidecar equipped motorcycles) Hand or foot control with no special requirements.	India has no comments.
<b>Clutch</b>	<b>Source</b>		
	<b>Contents</b>	If so equipped, a control on the left handlebar,	India has no comments.

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		<p>forward. Shall not prohibit the use of devices on the left side of the vehicle that combine operations of a clutch and gear selector.</p> <p>The IMMA proposal reflects the current and forward looking developments in this area.</p> <p>With the various new technologies being developed the IMMA proposal is intended to be less design restrictive while still meeting the intent of each of the current applicable regulations.</p>	
<b>Levers</b>	<b>Source</b>		
	<b>Contents</b>	<p>To be left out of this document and addressed as necessary with the appropriate systems.</p> <p>[These items can be identified by the shading in the Item and Source columns of this document]</p> <p>ECE 60 items covering ergonomic issues (Hand Levers, Foot Rests, Foot Levers, Rocker Arms and Pedals) are not included in this document. It is the belief of IMMA that as these items are fairly design restrictive, they should be</p>	<i>India has no comments.</i>

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		removed. As technology evolves, their designs should be governed by market forces and enable targeting specific market segments based on ergonomic efficiencies, or be included in specific system regulations as appropriate.  [These items can be identified by the shading in the Item and Source columns of this document]	
<b>Footrest</b>	<b>Source</b>		
<b>Foot Lever</b>	<b>Source</b>		
<b>Rocker Arms</b>	<b>Source</b>		
<b>Pedals</b>	<b>Source</b>		
<b>Selection</b>	<b>Source</b>		
<b>Foot Selector Manual Control</b>	<b>Contents</b>	If the vehicle is equipped with a manual clutch, and gear selection is performed independently from the clutch, the gear selector is a foot lever or rocker arm on the left side of the frame. Moving the forward part of the foot lever or rocker arm shall progressively select the gears: upward movement of the forward part for shifting to a higher gear position and downward movement for shifting to a lower gear position.	<ul style="list-style-type: none"> <li>• Higher gear and Lower gears may be defined.</li> <li>• The requirement on engine cc may be deleted as specification should be only based on gear shifting type.</li> </ul>

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		<p>A separate, positive "neutral" position shall be provided in either the first or second position in the gear selection order (i.e: 1-N-2-3-4. or N-1-2-3-4.). For [PTW's less than 200cc] vehicles, transmissions with the following shift patterns may be fitted:- Rotary pattern (i.e: N-1-2-3-4-5-N-1.). Reverse pattern, where moving the forward part of the foot lever or rocker arm shall progressively select the gears: upward movement of the forward part for shifting to a lower gear position and downward movement for shifting to a higher gear position.</p>	
<b>Hand Selector Manual Control</b>	<b>Contents</b>	<p>If the vehicle is equipped with a manual clutch, and gear selection is operated independently from the clutch, the gear selector shall be a control located on the left handlebar. If the operation of the control is through rotation of the handgrip, the anticlockwise rotation shall progressively select gears giving an increased forward speed and conversely for a reduced forward speed. A separate, positive "neutral" position shall be provided in either the first or second position in the gear selection order (i.e: 1-N-2-3-4... or N-1-2-3-4...).</p>	India has no comments

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<b>No.</b>	<b>Contents</b>	<b>GTR</b>	<b>Comments</b>
<b>Automatic or Semi-automatic Gear Selector Control</b>	<b>Contents</b>	If the vehicle is equipped with an automatic or semi-automatic transmission and/or gearbox, the control (if any) used to engage the transmission or select the gears shall be on the left side of the frame or on the left handlebar.	India has no comments
<b>Brake</b>	<b>Source</b>		
	<b>Contents</b>	Non ABS system, optional. ABS system: Required.	India has no comments
	<b>Colour of tell-tale</b>	amber	