

## **Proposal for supplement 1 to the 02 series of amendments to UN Regulation No. 39 (Speedometer and Odometer)**

**Submitted by expert from the Kingdom of the Netherlands \***

The text reproduced below was prepared by the expert from the Kingdom of the Netherlands, in order to propose an amendment to ECE/TRANS/GRSG/2025/13, as presented by OICA. The modifications to ECE/TRANS/GRSG/2025/13 are marked in (**bold**) **blue** for new or ~~striketrough~~ for deleted characters.

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\* In accordance with the programme of work of the Inland Transport Committee for 2025 as outlined in proposed programme budget for 2025 (A/79/6 (Sect. 20), table 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

## I. Proposal

*Paragraph 5.1.* amend to read:

- "5.1. An onboard ... of this Regulation **when displayed**. Additional graduations and numerical values are not permitted.

Tachographs or Recording equipment, or Tachograph Replacement Units, are not considered to be an on-board speedometer or odometer for the purpose of this paragraph."

*Paragraph 5.2.* amend to read:

5.2. **Speedometer**

The display of the speedometer shall be located within the direct field of view of the driver and must be clearly legible both day and night. **The provision on legibility during day and night does not apply to a speedometer in the Field of Vision Assistant (FVA) compliant with the technical requirements of UN Regulation No. 125 or UN Regulation No. 176.** The range of speeds displayed must be sufficiently wide to include the maximum speed of this type of vehicle as stated by the manufacturer.

~~The provision The provisions set out in paragraph 5.2. above do not apply to a speedometer in the Field of Vision Assistant (FVA) compliant with the technical requirements of UN Regulation No. 125 or UN Regulation No. 176.~~"

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## II. Justification

1. The proposal seeks to clarify that Field of Vision Assistant (FVA) approved to UN Regulations No. 125 or [176] are not to be considered ~~within the requirements of paragraphs 5.1. and 5.2. in UN Regulation No. 39~~ with regard to the visibility requirement during night and day in paragraph 5.2., since the speed displayed by the FVA is not the primary source of information.
2. Visibility requirements for the FVA are regulated in UN Regulations No. 125 and [176]. This provides that mandatory information (such as the vehicle speed) may only be displayed via FVA as a secondary source of that information. This restriction is done because mandatory information shall be permanently visible under all foreseeable circumstances. Paragraph 0.3 of the new Regulation on FVA further provides that if in the future there is a need to have FVA as a primary source for mandatory information, FVA shall be evaluated as such, and a test procedure shall be developed to enable to check that the information is visible at all-time.
3. There is a contradiction between UN Regulation No. 39 and the FVA Regulation No. [176], in that the latter permits speed display switch off and reduced display. In the FVA Regulation No. [176], Annex 4-Appendix 2 specifically mentions the speedometer is one of the examples of information allowed in the Field of Vision Assistant Area 2.
4. ~~The proposal seeks to make clear that FVA displays are not considered to be onboard speedometers or odometers for the purposes of paragraphs 5.1. and 5.2. within UN Regulation No. 39.~~