

Proposal for amendments to ECE/TRANS/WP.29/GRE/2025/2

Newly added: Blue Text

Deletion: ~~Red Strikethrough~~

I. Proposal

"5.5.5. Only light-signalling functions, **except for functions as mentioned in UN Regulation-148** may incorporate a logo. In this case of lamps incorporating a manufacturer logo, only two lateral logos (one on each side) or one central logo ~~may~~ **can** be fitted on the rear of the vehicle and only two lateral logos (one on each side) or one central logo ~~may~~ **can** be fitted on the front of the vehicle. All logos that are not vehicle manufacturer or body manufacturer logos are prohibited.

Markings required by UN Regulations, symbols and/or text that are not identifiable at a distance larger than 10 m* are not regarded as manufacturer logos."

Add a new footnote, to read:

"*In case of doubt, the character height shall not be more than 12 mm."

II. Justification

1. This proposal to amend UN Regulation No. 48 is submitted by the expert from Germany with the aim to clarify that only light signalling devices may incorporate an illuminated logo.

Note: Editorial correction for the placement of logos to have same understanding between rear and front of the vehicle.

2. At its ninetieth session, GRE pointed out that UN Regulation No. 149 should be amended in order to avoid misinterpretation. After consideration, the expert from Germany decided to amend paragraph 5.5.5. of UN Regulation No. 48.

3. This new proposal considers the remarks expressed during the GRE discussion at its ninety-first session, without changing the main idea. The formulation highlights that manufacturer logos are only allowed as part of some light signalling functions, and not as part of road illumination devices or retro-reflecting devices. In addition, the proposal is considering approvals already granted for road illumination devices that contain small text or symbols not visible at a small distance.

4. UN Regulation No. 148 explicitly states that stop lamps, direction indicator lamps, and reversing lamps must not incorporate a logo. However, ECE/TRANS/WP.29/GRE/2025/2 (Proposal for a Supplement to the 08 and 09 series of amendments to UN Regulation No. 48) mentions that Only light-signalling functions may incorporate a logo. This could lead to misinterpretation, as stop lamps, direction indicator lamps, and reversing lamps are also light-signalling functions. By adding this clause to UN R 48, we ensure consistency between the two regulations.

5. In order to have also an objective criterion for the non-identifiability, the size of 12 mm for the character height is added as a footnote. This value is based on informal document GRE-85-16. The visual acuity of a normal observer is defined as the ability to distinguish two objects with a distance of 1' (one arc

minute). At a distance of 10 m, 1' correspond to 3 mm. Consequently, a distance of 2.5 mm is too small to distinguish two objects at a distance of 10 m. In another way, if "d" of the Landolt ring correspond to 2.5 mm, the character height is approximatively 12 mm which ensure the non-identifiability at 10 m.

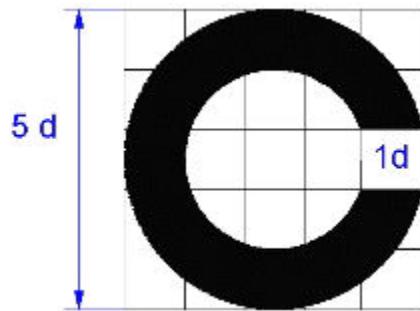


Figure 1
Landolt ring for measuring the visual acuity