U.S. Department of Transportation

National Highway Traffic Safety
Administration

# ##15A-98-3397-20 | Memorandum | 3 - | | - | | 0 | - 0 | 5

Subject:

<u>ACTION</u>: Transmittal to the Part 564, Replaceable Light Source Date: Information Docket, Docket No. 93-1 1, Appendix **A**; Information on Modifications to Replaceable Light Source Type **HB4**;

Submitted by OSRAM SYLVANIAINC.

Reply to Attn of

From

Acting Director, Office of Crash Avoidance Standards

**Docket Section** 

THRU: John Womack

Acting Chief Counsel

8 pages

<u>u</u> Hardie

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X66987

The enclosed Attachment is forwarded for placement in the Part 564, Replaceable Light Source Information Docket, Docket 93-11. The Attachment is a letter and drawings submitted by OSRAM SYLVANIA INC., that describe modifications to Docket No. 93-11-N01 entry numbers -007; Figure 19; Specifications for the Type HB3 Standardized Replaceable Light Source and entry number -008; Figure 20; Specifications for the Type HB4 Standardized Replaceable Light Source.

The purpose of this memorandum is to place in the Docket No. 93-1 1 file information submitted by OSRAM delineating modifications to the specifications for the Type HB4 light source. The OSRAM submittal contained the following modifications to the Type HB4 specifications:

- 1. Add a new note (#11) to Figure 20 (CONT.) that pertains to "Plane A" on Figure 20-2.
- 2. Changes the EH dimensions of Figure 20-3 from 0.748 inches/19.00 millimeters to 0.787 inches/20.00 millimeters. (Note that the end point dimension EH has been moved to a new position on the lamp base.)
- 3. Change the ES dimensions of Figure 20-3 from 0.039 MIN inches/l .OO MIN millimeters to 0.039 MAX inches/l .OO MAX millimeters.

OSRAM has submitted the enclosed Attachment in accordance with the requirements of Part 564 and attested that use of the light source as modified in the Attachment will not create a non-compliance with any requirement of Federal motor vehicle safety standard No. 108 (49 CFR 57 1.108) when used to replace an unmodified light source in a headlamp certified by its manufacturer as conforming to all applicable Federal motor vehicle safety standards.



This cover memorandum along with the attached **OSRAM** letter and modified HB4 drawings should be retained together and placed in Docket No. 93-1 1 **-N01** as entry number 93-1 1 -N0 **1-** 015. Unless stated on the submission as options the modifications requested in this submission are mandatory for compliance purposes.

Should you have any questions, please contact Richard Van Iderstine or Kenneth 0. Hardie of my staff. They may respectively be reached by telephone on x65280 or x66987.

Attachment (w/ 10 copies)

cc:

Associate Administrator for Plans and Policy Associate Administrator for Research and Development Associate Administrator for Safety Assurance

### DONELAN, CLEARY, WOOD & MASER, P.C.

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September 17, 1996

Associate Administrator for Rulemaking National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, D.C. 20590

Attention: Replaceable Light Source Information Docket **93-**11

Dear Sir:

Pursuant to 49 C.F.R. Part 564, OSRAM SYLVANIA INC. hereby resubmits an original and 10 copies of drawings and other Appendix A information for its Type 9005 and 9006 Replaceable Light Sources for filing in Replaceable Light Source Information Docket No. 93-1 1. This submission is intended to supersede a prior submission dated August 12, 1996 that currently is pending before NHTSA. The August 12, 1996 submission contains several inaccuracies that have been corrected in this submission. This submission reflects modifications to information previously filed in this docket.

## Identification of the Modifications 49 C.F.R. \$5645(d)(I)

These replaceable light sources are right angle base lamps, HB3 (9005) and HB4 (9006), shown in the attached sets of drawings labeled **Spec**. No. **C6C1700-0002** E and **Spec**. No. **C6C1800-0002** G, respectively. The modifications are listed in the following tables:

HB3 Osram Sylvania **Spec #C6C1700-0002E -** Sheet 5 reflects the following modifications to NHTSA Figure 19-3 in Docket 93-1 1:

Dimension	Current NHTS	SA Dimension	Modified	Dimension
	Inch	Mil	Inch	Mil
KS	.039 MIN	1.00 MIN	0.039 MAX	1.00 MAX
KH*	.748	19.00	.787	20.00

<sup>\*</sup> Please note that the end point of dimension KH has been moved to a new position on the lamp base.

Osram Sylvania **Spec.** # **C6C1700-0002E** - Sheet 2 also adds a new note **(#1**1) that pertains to "Plane A" on Sheet 4.

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#### DONELAN, CLEARY, WOOD & MASER, P.C.

HB4 Osram Sylvania **Spec #C6C1800-0002G -** Sheet 5 reflects the following modifications to NHTSA Figure 20-3 in Docket 93-1 1:

Dimensi	on Current N	HTSA Dimension	Modifi	ed Dimension
	Inch	Mil	Inch	Mil
ES	.039 MIN	1.00 MIN	0.039 MAX	1.00 MAX
EH*	.748	19.00	.787	20.00

<sup>\*</sup> Please note that the end point of dimension EH has been moved to a new position on the lamp base.

Osram Sylvania **Spec. # C6C1800-0002G -** Sheet 2 also adds a new note **(#1** 1) that pertains to "Plane A" on Sheet 4.

## Reason for Modifications 49 C.F.R. § 5645(d)(2)

The reason OSRAM requests these modifications is because of a secondary process that it now uses to manufacture both lamps. A new assembly line has been added that uses an inserted lug as opposed to an insert molded lug. The requested changes relate to the different molding processes. In order for OSRAM to use one **specification** drawing to accurately represent bulbs from both processes, the EH and **KH** dimensions are modified to read "MIN" and the KS and ES dimensions are shown at their maximum values instead of the minimum.

The reason for adding note #1 1 on Page 2 of both sets of specifications is to allow the use of different configurations of mounting pads (bosses) which will still accurately define a plane. The drawing only shows one option. However, Plane A is defined by using three points and many configurations are possible. For other configurations (which may be easier and less costly to mold) to be compliant, OSRAM modifies the drawings to allow for alternative mounting pad schemes. Plane A remains in the same location regardless of the geometry used to define it.

# Statement of Post-Modification Safety Compliance and Interchangeability 49 C.F.R. § 564.5(d)(3) and (4)

The proposed modifications will not create a non-compliance with any requirement of Motor Vehicle Safety Standard No. 108 (49 C.F.R. § 571.108) when used to replace an unmodified light source in a headlamp certified by its manufacturer as conforming to all applicable Federal motor vehicle safety standards. The modifications do not affect the operating characteristics or interchangeability of the lamps. Rather, they merely redefine the way the base is dimensioned and the method of defining Plane A, which remains in the same location. The fit of the lamps in the sockets is not affected nor are the operating characteristics.

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#### DONELAN, CLEARY, WOOD & MASER, P.C.

Please direct any questions to the undersigned, or to Clarice Clark, Project Engineer, **OSRAM** SYLVANIA, 275 W. Main Street, Hillsboro, N.H. 03244, **(603)** 464-5533.

Sincerely,

James R. Hobson Jeffrey 0. **Moreno** 

Counsel for OSRAM SYLVANIA INC.

Enclosures 7600-040



Automotive & Miniature Lighting Hillsboro, NH, 03244 Specifications Department

FIGURE 20 (CONT.)

Spec No. C6C1800-0002 G

Date: 9/1 0/96

Supersedes: 7/24/96

Sheet 2 of 9 sheets

	DIMENSION	INCI			<u>LIMETERS</u>
	· AA	0.591 max/0.217 m	nin	15.00 max/5.5	50 min
	AB	0.236		6.00	
	AC	45°		45°	
	AD	0.079		2.00	
	AE	1.09		27.8	
	AF	0.165		4.20	
	AG	0.346		8.80	
	АН	0.433		~11.00	
	Al	0.055		1.40	
	AJ	0.217 ± 0.006		5.50 ± 0.15	
	AK	0.06		1.5	
	AL	0.780 diameter		19.81 diamet	er
	AM	2.165		55.00	··
	AN	0.093		2.36	
	AO	0.157		4.00	
	AP	45° chamfer		45° chamfer	
	AQ	0.039	•	1,00	
	AR	+0.004			.10
	AIX	0.766	diameter	19.46	diameter
	4.0	-0.000		-0.	
	AS	0.866 ± 0.002 diar	neter	22.00 ± 0.05	alameter
	AT	0.079		2.00	
	AU	0.138		3.5	
	AV	0.209 min		5.30 min	
	AW	0.378		9.60	
$\triangle$	Dimensions shown are ma	ximum - may be smaller.			
$\triangle$		when the assembly		•	st withstand a minimum all aperture of 22.22 ±
$\triangle$	Diameters must be o	concentric within 0.2	20 mm (0.00	8 in).	
<u>\</u>	Glass bulb periphery about Point B. Key and <b>keyway</b> are	, ,		·	n the included angles ftermarket only.
$\triangle$	Measured at termina	Measured at terminal base. Terminals must be perpendicular to base and parallel within ±			
$\triangle$		Diameters must be concentric within 0.20 mm (0.008 in).			
$\triangle$		Absolute dimension. No tolerance.			
<u></u>	Glass capsule and s				of optional coherence as
<sub>A</sub> 11	by a continuous sur	face.			of optional schemes or
	2 Place	ERANCES UNLESS OF INCHES Decimals ± 0.02	MILLIN 1 Place De	IETERS cimals ± 0.5	i u u
		Decimals ± 0.010 ngular ± 1 °		cimals ± 0.30 ar ± 1 °	

ECO 18303 Engineering Strawbind d i z i n g Malar



Automotive & Miniature Lighting Hillsboro, NH, 03244 Specifications Department

FIGURE 20-2

Spec No. C6C1800-0002 G

Date: 9/10/96 Supersedes: 7/24/96

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#### SUBJECT: SPECIFICATIONS FOR THE TYPE HB4 STANDARDIZED REPLACE LIGHT SOURCE

## SPECIFICATIONS FOR THE 9006 REPLACEABLE BULB VIEW Y: FROM BULB END BB 3 PLC BD 2 PLC BC /1 BE 2 PLC OPTIONAL CONSTRUCTION (VIEW Y: FROM BULB END) BL BG BQ 3 PLC BF BK 2 PLC 8 R 3 PLC VIEW Z: FROM CONNECTOR END BO 3 PLC PLANE A-BP 3 PLC

<u>DIMENSION</u>	INCHES	MILLIMETERS
ВА	0.866 ± 0.002 diameter	22.00 ± 0.05 diameter
BB	<b>120° ±</b> 30 min	<b>120° ±</b> 30 min
ВС	0.866 diameter	22.00 diameter
BD	0.394	10.00
BE	0.118	3.00
BF	0.079	2.00
BG	0.315	8.00
ВН	1.181 diameter	30.00 diameter
BI	1.417 diameter	36.00 diameter
BJ	3"	3"
BK	30"	30"
BL	0.157	4.00
BM	0.39	9.9
BN	$0.079 \pm 0.004$	$2.00 \pm 0.10$
ВО	0.20	5.0
BP	0.030	0.75
BQ	120" typ	120 ° typ

ECO 18303 Engineering Sola a La Cola r d i z i n g Mulhor



Automotive & Miniature Lighting

Hillsboro, NH, 03244 Specifications Department

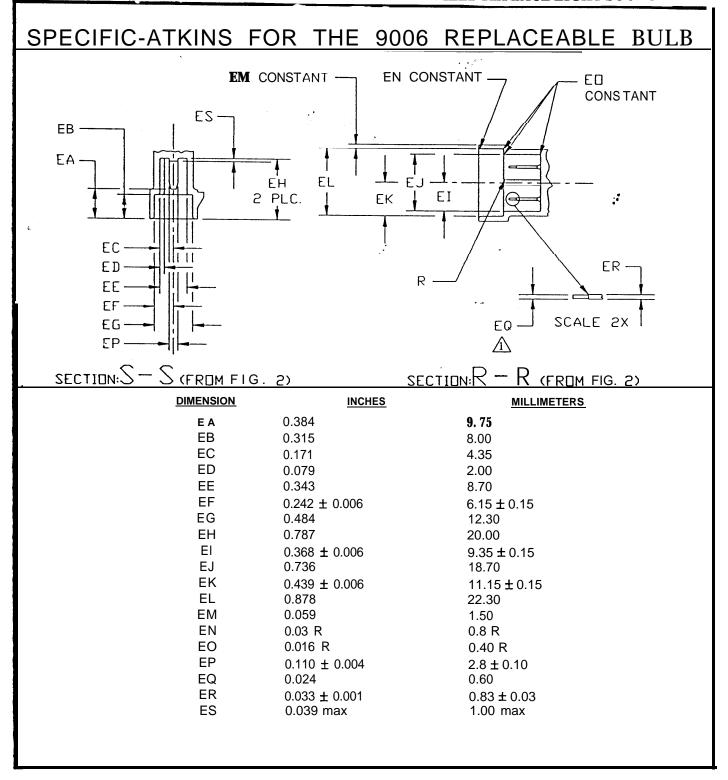
FIGURE 20-3

Spec No. C6C1800-0002 G

Date: 9/1 0/96 Supersedes: 7/24/96

Sheet 5 of 9 sheets

## SUBJECT: SPECIFICATIONS FOR THE TYPE HB4 STANDARDIZED REPLACE LIGHT SOURCE



Engineering Www Www Standardizing Musley