

Proposals for considering the “horizontal visibility range” issue for LDWS system regulation.

Any subsequent proposals for the visibility issue should take into account two aspects: Any overhead costs on homologation testing should be avoided.

A direct measurement of visibility adds costs in timing and infrastructure requirements and may even hinder the progress of a test, even where the system is able to operate in poor visibility. However, testing under unrealistic conditions should not be a Regulation requirement.

Therefore I would, instead of regulating the test visibility explicitly, suggest the use of one of the following proposals.

1) Don't specify the visibility at all.

2) Use an indirect visibility specification such as:

The test should be performed under visibility conditions that allow safe driving at the required test speed.

Justification:

Regulating the visibility would mean referring a special technical requirement for LDWS systems. An infrared sensor based approach may present different limitations on visibility than that needed by a video based approach.

Therefore the regulation should not specify the visibility directly but by a general test requirement along with the test speed. As long as it is safe to operate at test speed, the LDWS system has to be able to function. Therefore testing will not be performed during extreme fog, rain or snowfall, whilst under all other conditions, the currently available systems will not have problems.