

Submitted by the expert from Poland

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agenda item 4)

Polish comments to GRE-83-24

Poland

19-23 October 2020

Poland clearly expressed in GRE-81-22 the comments, questions and advice to IWG-SLR regarding Stage 2 of „simplification” in regard to RID. We regret to say that these important issues have been ignored.

*Therefore Poland is repeating in simple way the minimum general expectation regarding **photometric requirements of Stage 2 for RID** based on minimum safety requirements, basic photometry knowledge, logical reasoning, and common sense.*

- It should be described the **only one** „minimum for safety” set of requirements. Basically it is „road illumination (**RI**) and „glare protection” (**GP**). If there are any special conditions (like speed limit, fog or adverse weather) they should be unambiguously defined to be recognised by driver during driving in real traffic.
- It is illogical to require more for any device (class) than is permitted to be legally used under the same conditions as any other authorized and defined device.

- Should be defined only one class for general use. If this class is the **Basic /"C" Passing beam** and is **sufficient to illuminate the road** at night and there is **no restrictions** for use of this class e.g. speed limit, then the additional requirements for „other classes” should concern only traffic conditions (**GR**). This means that any **driving beam** should meet only **Basic /"C" Passing beam RI** requirements when for **driving beam** should be not provisions for glare **GR** except the maximum luminous intensity for whole set of headlamps only.
- As result should be only above requirements for **whole set** of (any) **driving beam(s)**. Therefore there is no reason for additional (auxiliary, secondary, etc.) driving beam because it should be free for manufacturer discretion.
- But if **Basic /"C" Passing beam** is **insufficient for safe driving** with any speed (which is maybe possible with one or more driving beam/s) such restrictions (like speed limit) should be integral part of **Basic /"C" Passing beam** requirements

- There is no justification for CS and DS class for motorbikes. They should have (single or set of) headlamp(s) meeting together doubled requirements for Basic /"C" Passing beam. Otherwise there is technology discrimination for any of non motorbike vehicles. Or requirements for one of CS or DS class should be enough for pair/set of any other vehicle (car, heavy good etc.) and should replace **Basic/"C" Passing beam**

- **Low speed /"V" Passing beam** should be associated with clear value of speed limit but not with vehicle category („design” factor)
- **Low speed Driving beam** should be associated with clear value of speed limit different than for **Low speed /"V" Passing beam**. If there is the same speed limit as for **Low speed /"V" Passing beam** there should be no separate **RI** photometric requirements but for **Low speed Driving beam** only **GP** limits should be removed from requirements for **Low speed /"V" Passing beam**
- **AS** and **BS class for mopeds** should be replaced with **Low speed /"V" Passing beam** with doubled values for single lamp (set) or clear but different speed limit than for **Low speed /"V" Passing beam** should be required and justified

- Motorway/"E" Passing beam should be associated with clear value of speed limit different than for Basic /"C" Passing beam. If no speed limit shall be associated with Basic /"C" Passing beam than Motorway/"E" Passing beam should have the same **RI** requirements like Basic /"C" Passing beam but only **GR** could differ
- ADB class should have the same (minimum) requirements for **RI** like Basic /"C" Passing beam if it is sufficient to use with any legal driving conditions (speed). If not then restrictions for use (speed limit) for Basic /"C" Passing beam should be introduced.
GR for ADB Requirements should replace existing **GR** of Basic /"C" Passing beam under condition that (**GR**) are possible to objective testing for whole ADB system in the way effectively representing real traffic conditions

- Photometric requirements for **Fog beam** should be supplemented by specific conditions of use which are possible to objective discrimination by any driver. E.g. **speed limit**, density of fog and other necessary criteria should be integral part of requirements description. It cannot be left to discretion of national law because photometric requirements should unambiguously describe photometric behaviour and safety which are common and related to lighting performance and weather condition only.

Thank you for attention



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