Informal document **GRE-85-29** (85th GRE, 26–29 October 2021, agenda item 4 (e))

Submitted by the expert from Poland

JUSTIFICATION for GRE-85-19



Reg. 48



Existing situation



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At the moment, there are very wide load/ levelling tolerances





Necessity to use MANUAL LEVELING DEVICE





GLARE FOR IDEAL SITUTION

height of headlamp below 0.95 cm



100m

33m

GLARE FOR higher mounted headlamps

height of headlamp over 1.0 m



GLARE FOR REAL SITUTION – improper use of manual levelling device

INITIAL AIM ISSUE ANYWHERE INSIDE BOX

Poland proposed initial aim anywhere inside box for IWG-VGL

because of OICA request for prolonged use of manual levelling device

For today – automatic levelling only

Justification no longer valid - Poland withdraws proposal for initial aim anywhere inside box

Initial aim should be **performance based** – the same road illumination for each mounting height



MISTAKE OF GRE/2020/8/ Rev.2







PROPOSAL – standard height







PROPOSAL - low mounted headlamp





75m

PROPOSAL - high mounted headlamp

Detection distance for different kind of headlamps (20m – 100 m)





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PEDESTRIAN FATALITIES IN RELATION TO MONTH AND DAY HOUR

Pedestrian deaths FARS, 1987-2003



GTB Glare and Visibility Forum, Geneva, **22 October** 2018

> M. J. Flannagan UMTRI



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DARKNESS HAS VERY DIFFERENT EFFECTS BY CRASH TYPE

GTB Glare and Visibility Forum, Geneva, 22 October 2018 For fatal crashes, darkness increases risk by factors of:

4.60

- Two-vehicle 1.33
- Road departure 0.99
- Pedestrian 4.14
- Animal

M. J. Flannagan UMTRI





FOR FATAL PEDESTRIAN CRASHES,

DARKNESS INCREASES RISK BY FACTORS OF 12



Headlamp mounting height (m)





Aiming (%)



Proposal

Current technology of (static) automatic levelling devices is compatible with repeatability for any load distribution on the car better than possible to measure (better than $\pm 0.1\%$). As general rule it is proposed to restrict "box" to $\pm 0.2\%$ from initial aim value as the best choice.

Headlamp mounting height (m)



Proposal

Above requirements are optimal from safety and "technology neutral" point of view

However while it is impossible to meet above requirements because of design constraints of vehicle which are impossible to avoid

it is proposed to allow

values of levelling tolerances ("box shape") as offered in GRE/2020/8/Rev.2



Proposal

ALTERNATIVE POSSIBILITY AS IN GRE/2020/8/Rev.2

Headlamp mounting height (m)



Aiming (%)



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FINALLY

Proposed solution IS OPTIMUM because allow TO AVIOD AN UNSATISFACTORY COMPROMISE:

• REQUIRE OPTIMAL BALANCE BETWEEN ROAD ILLUMINATION AND GLARE

• ALLOWS EXCEPTIONS BUT ONLY WHEN REALLY NECESSARY

A similar solution was applied in many other paragraphs of Reg. No 48 (e.g. 6.5.4.3.; 6.7.4.2.1.; 6.9.4.2.; 6.10.4.2.; 6.14.4.2.; 6.15.4.2.; 6.17.4.2.; 6.17.4.3.; 6.18.4.2.; 6.18.4.3.; 6.19.7.3.; 6.21.1.2.3.; 6.21.1.2.3.; 6.21.7.1.)



Thank you for attention

