Superimposing both current and proposed R48 requirements on the same graph demonstrates the differences between the two sets of criteria.

The orange line outlines the mid-point of the new requirements which could reasonably be considered as the nominal headlamp aim initial set point for vehicles.

Vehicles compliant with the current requirements are in circulation on public roads across the globe and road users have raised concerns over glare caused by oncoming and following traffic.

It is reasonable to suggest that permitting vehicles headlamp aim to move further across to the left into the red zone during approval has the potential to increase the occurrence of glare in real world conditions on the road even though rudimentary theoretical representations suggests otherwise.

The increased potential for glare undermines the motivation for amending the headlamp aim criteria in line with the proposal. Therefore, the possibility of a phased approach to amending aim criteria should be considered.