

GTB - Davide PUGLISI

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A: 'Kärkkäinen Timo'; 'Konstantin Glukhenkiy'
Cc: 'Rovers, Derwin'; 'GTB - Davide PUGLISI'
Oggetto: Comments to draft list of main decisions.

Dear All,

Yesterday we had in Poland national holiday therefore in response to encouragement to sent supplement to document I'm sending you this suggestions today.

I don't know if there are comments to draft list of main decision or to report but I would like to notice that Poland clearly expressed that will object doc. based directly on GRE-84-16 (agenda 4.c) if it will not be corrected to be truly performance based (oriented). Doc. GRE-84-28 clearly describe reservations more or less similarly than raised by Poland many times in the past. If I correctly remember there was no discussion on documents GRE-84-16 and GRE-84-28 (silence). So I don't know what decisions regarding it was made.

Poland announced its position to IWG-SLR in the past and IWG-SLR is aware of it. We clearly described reservations and proposed solutions which would improve the document and really simplified it and make it acceptable. Nothing of it was taken into account.

I recall it briefly:

- Far more radical simplify requirements is possible and reduce number of "classes" to really necessary. In fact even one but flexible.
- Minimum parameters that clearly define measurable safety.
- If no speed restrictions (or road illumination distance information) is assigned to the class than should be required the only one minimum set of requirements (class) for passing beam for any vehicle (not for headlamp) used in the same driving conditions at night.
- If there is any justification to have more than one class – each of class should be supplemented with speed (road illumination distance) limit taking into account worst case aiming / levelling possibility and the obligatory safety information should be hand-on to the vehicle owner.
- Artificial "flux zones" instead of light source flux cannot be accepted. If photometric requirements are sufficient then light source flux requirements are not needed. But it is obvious and confirmed that proposed minimum photometric requirements are not sufficient.

Both the present and the proposed requirements do not prohibit much better road illumination / glare protection than minimal. But this minimal do not guarantee the minimum safety. Typical contemporary headlamps can illuminate the road some times better than minimum requirements. Therefore there is no reason to replace one set of insufficient minimum requirements by another but insufficient one.

I submit above observations for the consideration of the IWG-SLR and I remain at your disposal if the IWG-SLR wishes to take them seriously into account.

With best regards,

Dr. Eng. Tomasz Targosinski

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