

# GRE TF/SR discussion on LED replacement light sources

Philipp Plathner, Walter Schlager, Bart Terburg

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Bonn, Germany

# Content

## (1) Starting point and reference

- What has been discussed in GRE so far?

## (2) Potential ways forward

- UN approval process
- National approval process

## (3) Technical background – Photometrical tutorial

# Content

## (1) Starting point and reference

- What has been discussed in GRE so far?

## (2) Potential ways forward

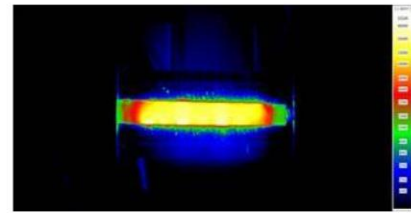
- UN approval process
- National approval process

## (3) Technical background - Photometrical tutorial

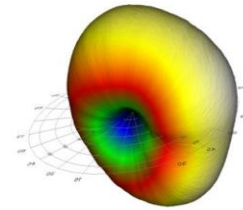
# UN R37 approval full photometric equivalence according to guideline (GRE-83-15)



## Example 1: Signalling light source C5W (low power)



Near field: filament-like



Far field: filament-like

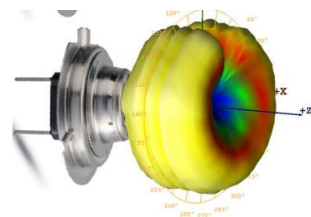
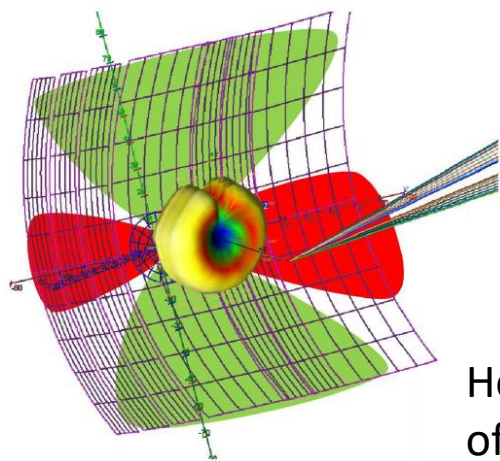


- **PRO's**
  - complete set of light source specifications based on "full equivalence" to incandescent technology
    - Possible for 5W types with today LED technology
    - Possible for 10W and 20W types in near / mid future
  - Leads to same photometric performance in the application
  - No need for testing in the luminaire (i.e. no need for positive list)
- **CON's**
  - none

Full equivalence achievable – maintain as-is

# UN R37 approval full photometric equivalence according to guideline (GRE-83-15)

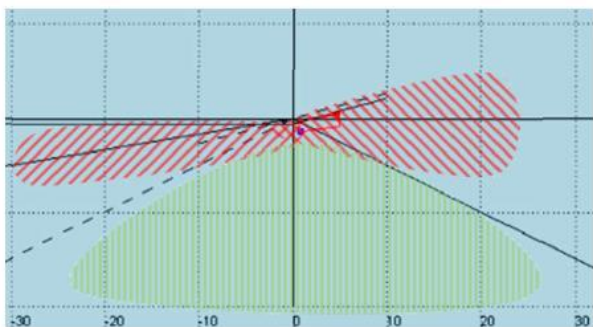
## Example 2: Road illumination light source H7 (high flux)



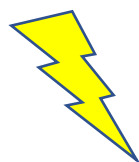
Far field: filament-like

Homogeneous illumination  
of whole reflector (green and red  
segments)

from  
reflector segment  
to  
light on the road

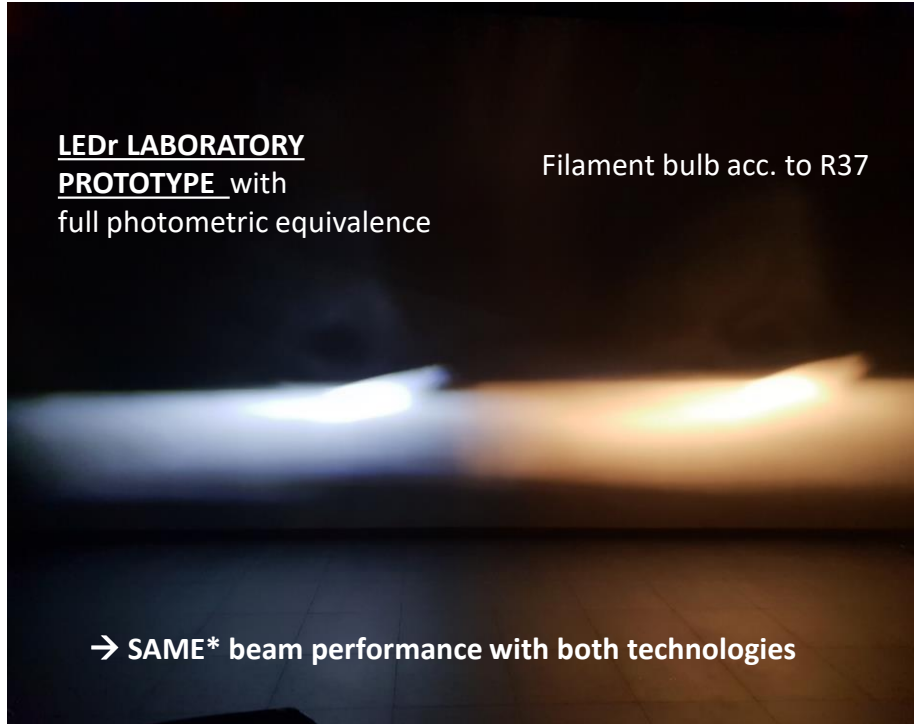


- PRO's
  - complete set of light source specifications based on "full equivalence" to incandescent technology
    - But not technically feasible today for high flux categories
  - It would ...
    - lead to same beam performance
    - mean no headlamp testing, no positive list needed
- CON's
  - Full equivalence (= emulation of filament) would not improve the beam performance, i.e. advantages of LED technology not utilised



**full-equivalence solutions not feasible for high flux categories  
with today's LED technology**

# Technology neutral full equivalence



*\* Besides the color temperature*

## CON's

Full equivalence (= emulation of filament) does show the same beam performance, i.e. advantages of LED technology not utilised

- Same photometric values
- Only change of colour temperature

# Excerpt from GRE-87 report

- Section 15 (copied and emphasis added):

The expert from IEC analysed the approval process of LED replacement light sources according to UN Regulation No. 37 (GRE-87-02), based on the full photometric equivalence according to the guidelines (GRE-83-15). According to him, full-equivalence solutions were not feasible for high flux categories with the today's LED technology. As a consequence, some countries were issuing national approvals deviating from the full photometric equivalence, based on extensive testing (in headlamps and vehicles) for limited light source specifications and resulting in a positive list for particular vehicle models. *GRE stressed the advantages of harmonization at the United Nations level* and noted that *several contracting parties were in favour of cautious re-evaluation of the equivalence criteria* for LED replacement light sources. *GRE invited IEC to start this work as a new activity of the Task Force on Substitutes and Retrofits (TF SR) in cooperation with those contracting parties.*

- Target of discussion in this Task Force:

- Create foundation for a converging discussion to achieve LEDr unification in all UNECE countries

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# Potential ways forward for high power LEDr (in R37 / RE5)

## 1 – “intelligent equivalence” on light source level (also called “EQ+”)

- Detailed light source specification via emission in two directions
- Making full use of LED technology benefits
- Several deviations from “full photometric equivalence”
  - Keeping LEA and contrast requirements (in 2 viewing directions only)
  - Modified far-field emission requirements
- Valid in all headlamps / vehicles
- No need to consider mis-use
- Not used in any country so far

## 2 – “application-level equivalence” (also called “positive list approach”)

- Very limited requirements on light source level
- Making full use of LED technology benefits
- Confirmation of UN compliant photometry in the application by measurement
- Valid in tested vehicles / headlamps \*
- Already accepted by several contracting parties (via national type approval)
  - Germany, and some countries accepting:
    - Austria
    - Czech Republic
    - Croatia
    - Slovenija
  - France
  - South Korea

\* Mis-use can be addressed via “special measures” to prevent glare , to be discussed further

# Potential ways forward for high power LEDr (in R37 / RE5)

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# Starting Point: enforced specifications given by full photometric equivalence

## Sheet H11 LEDr/1 and/2 remain unchanged !

WP.29/2021/145

Potential ways forward “intelligent equivalence”

ECE/TRANS/WP.29/2021/145

Category H11 Sheet H11\_LED/1

The drawings are intended only to illustrate the essential dimensions (in mm) of the LED light source.

Figure 1  
Main drawings

Figure 2  
Maximum LED light source outline<sup>1)</sup>

1) The reference plane is the plane formed by the underside of the bevelled lead-in flange of the cap.  
2) The reference axis is perpendicular to the reference plane and passing through the centre of the 19 mm cap diameter.  
3) The LED light source shall not exceed the envelope as indicated in Figure 2.  
4) The light source shall function in either voltage polarity.  
5) Measurement point for cap temperature T<sub>cap</sub>

ECE/TRANS/WP.29/2021/145

Category H11 Sheet H11\_LED/2

Table 1  
Essential electrical and photometrical characteristics of the LED light source

Dimensions in mm	LED light sources of normal production			
a <sup>2)</sup>	35.0 nom.			
f <sup>2)</sup>	4.5 nom.			
Cap diameter <sup>3)</sup>	19 mm			
Elevated ambient air temperature <sup>4)</sup>	60°C			
Cap	H11	PG19-2 <sup>5)</sup> in accordance with IEC Publication 60061 (sheet 7004-110-3)		
<b>Electrical and photometric characteristics</b>				
Rated values	Volts	12	24	
	Watts	27 <sup>10)</sup>	27 <sup>11)</sup>	
Test voltage (DC)	Volts (DC)	13.2	28.0	
Objective values	Power <sup>6)</sup>	Watts	27 mm <sup>10)</sup> 62 max. <sup>11)</sup>	27 mm <sup>10)</sup> 62 max. <sup>11)</sup>
	Cap temperature T <sub>cap</sub>	°C	120 max. <sup>10)</sup>	120 max. <sup>10)</sup>
	Electrical current	mA	2000 mm. <sup>10)</sup> (at 14V DC)	1000 mm. <sup>10)</sup> (at 28V DC)
	Luminous flux <sup>7)</sup>	lm	1,350 ± 10%	
Luminous flux deviation <sup>8)</sup> (voltage range limits)	lm	±10% (at 12V) ±10% (at 14V)	±10% (at 24V) ±10% (at 28V)	

1) The light emitted shall be white without a correlated colour temperature restriction.  
2) To be checked by means of a “box system”, sheet H11\_LED/3  
3) The luminous flux measured at the elevated ambient air temperature shall be at least 75% of the objective luminous flux (both measured at test voltage)  
4) In case of a failure of any of the light emitting elements (open circuit failure), the LED light source shall either still comply to the requirements concerning luminous flux and luminous intensity distribution or stop emitting light whereby, in the latter case, the electrical current draw, when operated between 12 V and 14 V, shall be less than 100 mA  
5) In case of a failure of any of the light emitting elements (open circuit failure), the LED light source shall either still comply to the requirements concerning luminous flux and luminous intensity distribution or stop emitting light whereby, in the latter case, the electrical current draw, when operated between 24 V and 28 V, shall be less than 50 mA  
6) The contrast is the proportion of luminous flux originating from two different areas, see details in sheet H11\_LED/3  
7) The maximum luminous flux deviation at the tolerance limits is calculated by using the measured flux at test voltage as reference. The luminous flux behaviour shall be substantially uniform within the specified voltage range.  
8) Including AE device, if any  
9) The maximum specifications of parameters G and K are excluded, but the maximum outline dimensions in Figure 2 apply  
10) Not applicable for high-efficiency type (if no AE device is specified)  
11) For high-efficiency type 18W rated value and 21W max. objective value applies

Figure 1  
Main drawings

View A

View C

# Starting Point: enforced specifications given by full photometric equivalence

## Sheet H11 LEDr/3 changes

WP.29/2021/145 → Sheet H11\_LED<sup>r</sup>/3

KEEP all essential characteristics (Table 1) unchanged, especially the box and contrast requirement to avoid glare !

These correspond to the primary (main) directions of emission “A” and “-A”

REMOVE the box requirements in the secondary (third) direction “B”

In order to maintain relationship between meridional “A” and “-A” emission directions INSERT one new parameter: the spacing parameter “z” describing the “thickness”

ECE/TRANS/WP.29/2021/145

Category H11	Sheet H11_LED <sup>r</sup> /3
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Screen projection requirements

The following test is intended to define the requirements for the apparent light emitting area of the LED light source and to determine whether the light emitting area is correctly positioned relative to the reference axis and reference plane in order to check compliance with the requirements.

The position of the light emitting area is checked by a box system defined in Figure 4 when operated at test voltage, which shows the projections when viewing from B (see sheet H11 LED<sup>r</sup>/1, Figure 1) and from A and -A (see sheet H11 LED<sup>r</sup>/1, Figure 1), i.e. along the C-planes C<sub>0</sub>, C<sub>90</sub> and C<sub>270</sub> (as defined in Figure 6).

The proportion of the total luminous flux emitted into these viewing directions from the area(s) as defined in Figure 4:

- Total box area:  $(A+B+C) / E$  shall be not less than 90%
- Area A:  $A / (A+B+C)$  shall be not more than 10%
- Areas B<sub>1</sub>, B<sub>2</sub> and B<sub>3</sub>:  $B_1/B, B_2/B, B_3/B$  shall each be not less than 15%
- Area B:  $B / (A+B+C)$  shall be not less than 72 %
- Area C:  $C / (A+B+C)$  shall be not more than 22%

Figure 4  
Box definition of the light emitting area (dimensions given in Table 2)

The contrast is checked by a box system defined in Figure 5 when operated at test voltage, which shows the projections when viewing from A and -A (see sheet H11 LED<sup>r</sup>/1, Figure 1), i.e. along the C-planes C<sub>90</sub> and C<sub>270</sub> (as defined in Figure 6).

The contrast is the proportion of the total luminous flux values emitted into these viewing directions from the corresponding areas  $(A+B+C)$  and D. The value of the contrast  $(A+B+C) / D$  shall be within the limits given in Table 1 (see Figure 5 for the definition of the area D).

“intelligent equivalence”  
Potential ways forward

# Re-distribute the light ...we can give room for good illumination

## Sheet H11 LEDr/4 and/5 remain unchanged !

WP.29/2021/145

ECE/TRANS/WP.29/2021/145

Category H11

Sheet H11\_LEDr/4

Figure 5  
Box definition of the area D (dimensions given in Table 2)

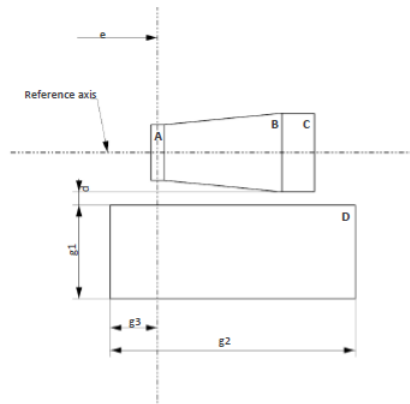


Table 2  
Dimensions of the box definitions in Figure 4 and Figure 5

All views (as specified above)	Dimensions in mm	All views (as specified above)	Dimensions in mm
a1	1.7	x1	25
a2	1.9	x2	19
b1	0.2	y1	12.5
b2	0.2	g1	2.85
c1	5.0	g2	7.5
c2	4.0	g3	1.45
d	0.4		

ECE/TRANS/WP.29/2021/145

Category H11

Sheet H11\_LEDr/5

### Normalized luminous intensity distribution

The following test is intended to determine the normalized luminous intensity distribution of the light source in the C-planes as described in Figure 6 when operated at test voltage. The intersection of the reference axis and the plane parallel to the reference plane at distance  $e = 25.0$  mm is used as the coordinate system origin.

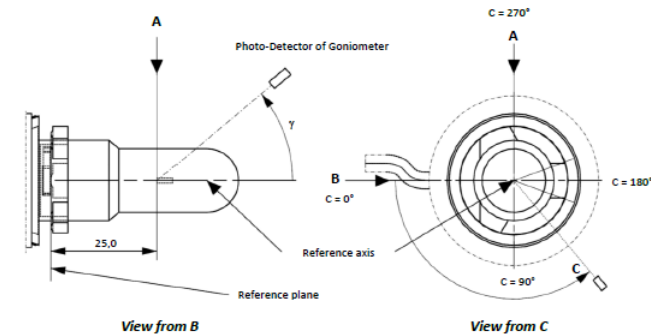
The light source is mounted on a flat plate with the corresponding holder features. The plate is fixed to the goniometer table by a bracket, so that the reference axis of the light source lines up with one of the rotating axis of the goniometer. The corresponding measurement set-up is described in Figure 6.

Luminous intensity data is recorded with a standard photo-goniometer. The measurement distance should be chosen appropriately in order to make sure that the detector is located in the far field of the light distribution.

The measurements shall be performed in C-planes for which the line of intersection coincides with the reference axis of the light source. The test points for each plane and polar angles  $\gamma$  are specified in Table 3.

The measured luminous intensity values, normalised to the measured luminous flux of the individual light source under test, shall be converted to normalised luminous intensity values of a 1000 lm light source. These data shall comply with the limits as defined in Table 3.

Figure 6  
Setup to measure the luminous intensity distribution and the definition of C-Planes and angle  $\gamma$



C-planes: see CIE publication 70-1987, "The measurement of absolute intensity distributions".

# Re-distribute the light ...we can give room for good illumination

## Sheet H11 LEDr/4 and/5 remain unchanged !

WP.29/2021/145 → Sheet H11\_LED<sup>r</sup>/6

ALLOW more light in the main emission directions (“A” and “-A”) and remove intensity requirement for direction “B”

(i.e.: amend Table 3 – Part 2)

This means making full use of LED technology benefits

ECE/TRANS/WP.29/2021/145

Category H11

Sheet H11\_LED<sup>r</sup>/6

Table 3 – Part 1  
Test point values of normalized intensity (Black top area)

$\gamma$	LED light source of normal production	
	Minimum intensity (cd/km)	Maximum intensity (cd/km)
	$C_0, C_{90}, C_{180}, C_{270}$	$C_0, C_{90}, C_{180}, C_{270}$
0°	n/a	10
10°	n/a	10
20°	n/a	10
30°	n/a	10

The light pattern as described in Table 3 – part 1 shall be substantially uniform, i.e. in between two adjacent grid points the relative luminous intensity requirement is calculated by linear interpolation using the two adjacent grid points. In case of doubt this may be checked in addition to verification of the grid points given in Table 3 – part 1.

Note: The angular range in Table 3 – Part 1 is equivalent to the black top of its counterpart H11 filament light source specified by  $\gamma_3$  in sheet H11/3.

Table 3 – Part 2  
Test point values of normalized intensity (Distortion free area)

$\gamma$	LED light source of normal production	
	Minimum intensity (cd/km)	Maximum intensity (cd/km)
	$C_0, C_{90}, C_{270}$	$C_0, C_{90}, C_{270}$
50°	80	130
60°	80	130
70°	80	130
80°	80	130
90°	80	130
100°	80	130
110°	80	130
120°	80	130
130°	80	130
140°	80	130

The light pattern as described in Table 3 – part 2 (excluding the section between  $C_{90}$  and  $C_{270}$ ) shall be substantially uniform, i.e. in between two adjacent grid points the relative luminous intensity requirement is calculated by linear interpolation using the two adjacent grid points. In case of doubt this may be checked in addition to verification of the grid points given in Table 3 – part 2.

Note: The angular range in Table 3 – Part 2 is equivalent to the distortion free area of its counterpart H11 filament light source specified by  $\gamma_2$  and  $\gamma_1$  in sheet H11/3.

# Re-distribution of light will focus on main emission of light

WP.29/2021/145 → Sheet H11\_LED/7

Consequently, LESS light needs to be required in the sagittal emission directions (“B”).

(i.e.: amend Table 3 – Part 3)

This does not compromise safety as the corresponding light of a filament emission profile is not used in safety-critical parts of the beam (this corresponds to foreground light, quite close to the car, where usually there is an abundance of light)

***This is a minor editorial change:  
A bit less light in the one direction,  
A bit more in the other.***

ECE/TRANS/WP.29/2021/145

Category H11 Sheet H11\_LED/7

Table 3 – Part 3  
Test point values of normalized intensity (Shading area of the lead-in wire of the counterpart filament light source)

C-plane	LED light source of normal production	
	Minimum intensity (cd/kim)	Maximum intensity (cd/kim)
	$\gamma = 90^\circ$	$\gamma = 90^\circ$
C <sub>0</sub>	80	130
C <sub>30</sub>	80	130
C <sub>60</sub>	80	130
C <sub>90</sub>	80	130
C <sub>120</sub>	80	130
C <sub>150</sub>	80	130
	n/a	n/a
	80	130
C <sub>240</sub>	80	130
C <sub>270</sub>	80	130
C <sub>300</sub>	80	130
C <sub>330</sub>	80	130
C <sub>360</sub> (= C <sub>0</sub> )	80	130

The light pattern as described in Table 3 – part 3 (excluding the section between C<sub>150</sub> and C<sub>210</sub>) shall be substantially uniform, i.e. in between two adjacent grid points the relative luminous intensity requirement is calculated by linear interpolation using the two adjacent grid points. In case of doubt this may be checked in addition to verification of the grid points given in Table 3 – part 3.

*Note: Due to the shading area created by the lead-in wire of its counterpart H11 filament light source (opposite to the metal-free zone; see Figure 4 on sheet H11/2) there is no requirement in the C<sub>180</sub>-plane.*

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# Vehicle Specific Approval National Approval Process in Germany and France



## Steps of testing by external test house

**1. Light source**  
photometry and geometry check & Mechanical vehicle installation check



**2. Headlamp**  
photometry check (e.g. ECE R112) in left & right luminaire



**3. Electrical in-vehicle** installation check & definition of additional electronics, if needed



**4.** Submission of expert report to approval body by external test house



**5.** Verification and approval by approval body



Street legal product for the tested and approved car list (positive list)

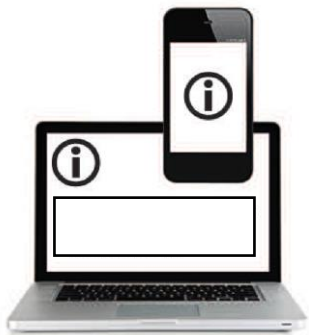


# Vehicle Specific Approval – what does it mean for the consumer?

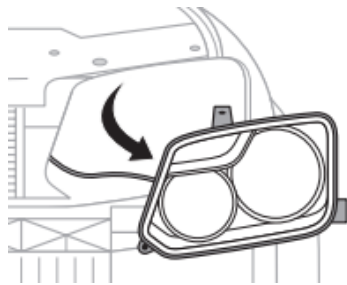


## Step BEFORE lamp & Acc. purchase

1. Check vehicle compatibility



2. Identify approval numbers



The E-number of the headlamp is the guiding number!

## Step AFTER lamp & Acc. purchase

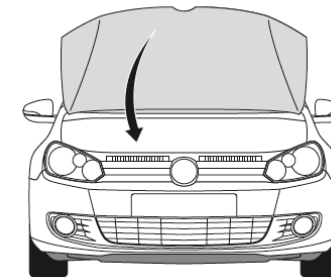
3. Download approval



4. Print approval and carry along



5. Attach sticker in the engine compartment (optional)



Criteria for street approval fulfilled



# Some further details on vehicle coverage by „positive list“

## Status Quo Germany

### List of vehicles already tested

Example: Page 23 of vehicle list for **ams OSRAM H7-LED**

Similar lists exist for other light sources covered by „positive list“ from ams OSRAM (H4-LED) and Lumileds (H7-LED and H4-LED)



Auto Service

Prüfbericht Nr. / Test report No.: 20-00014-CM-GBM-12  
 Hersteller / Manufacturer: OSRAM GmbH, D-80807 München  
 Typ / Type: H7-LED

ANLAGE 1/12V  
 ENCLOSURE 1/12V

#### Verwendungsbereich / Application range

				Verbaut in folgenden Fahrzeugen / Installed in the following vehicles:			
Lfd. Nr. Fahrzeug	Scheinwerfer-Genehmigung Nr.	Variante Austausch Lichtquelle	Auflagen / Hinweise	Hersteller	Fahrzeugtyp (Genehmigungsnr.)	Handelsbezeichnung (EU-Fahrzeugklasse)	Abblendlicht (A) / Fernlicht (F); [FK]*
No. of vehicle	Headlamp approval no.	Variant replacement light sources	Requirements / Remarks	Manufacturer	Vehicle type (no. of homologation)	Trade name (EU vehicle class)	passing-beam (A) / driving-beam (F); [FK]*
128)	E1 2538	100	1)	RENAULT (F)	Z (e2*2001/116*0373* ..)	Megane (M1)	A
156)	E1 3674	100	1)6)		Z (e2*2001/116*0373* ..)	Megane (M1)	A / F [17,5]
75)	E9 16479	100	1)	SEAT (E)	KJ (e9*2007/46*3134*..)	Ibiza (M1) / Arona (M1)	A
149)	E1 2853	11F ww. / or 1IG	2)		7N (e1*2007/46*0402*..)	Alhambra (M1)	A
150)					7N (e1*2007/46*0435*..)	Alhambra (N1)	
165)	E9 14198	100	1)		FP (e9*2007/46*6394*..)	Ateca (M1)	A / F
13)	E1 3340	100	1)	SKODA (CZ)	5E (e11*2007/46*0243*..)	Octavia (M1)	A
102)		10B ww. / or 10G	2)		5E (e11*2007/46*0243*..)	Octavia (M1)	A
103)	E1 4337	100	1)5)		5E (e11*2007/46*0244*..)	Octavia (N1)	
143)					5E (e8*2007/46*0318* ..)	Octavia (M1)	
142)	E8 7375	1B0	1)		3T (e8*2007/46*0317* ..)	SUPERB (M1)	A
201)	E8 8081	1B0	1)6)	AA (e13*2007/46*1169*..)	Citigo (M1)	A / F [20]	

§22a K 1821\*12

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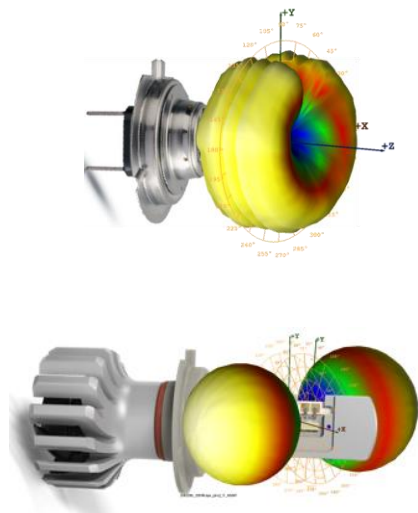
# Currently regulated category and nationally approved products Existing H11-LEDr in R.E 5 and H7\_LED with ABG

Key elements discriminating the light source specification

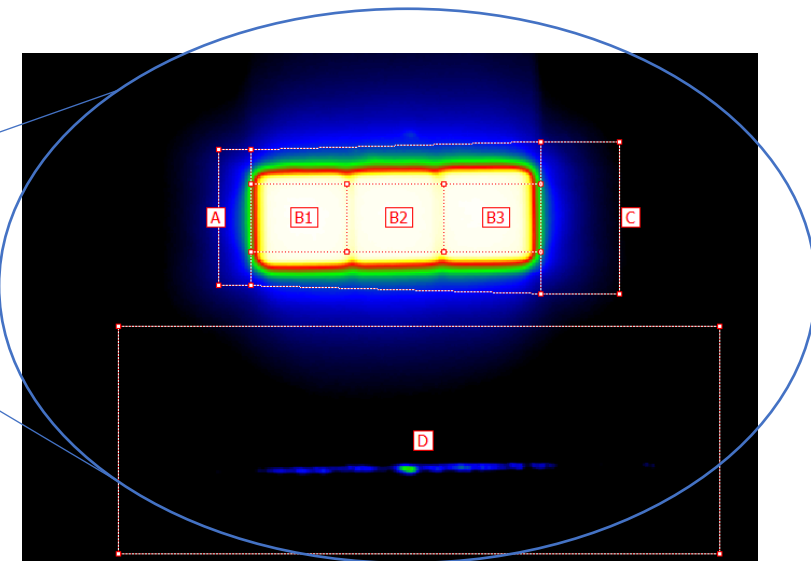
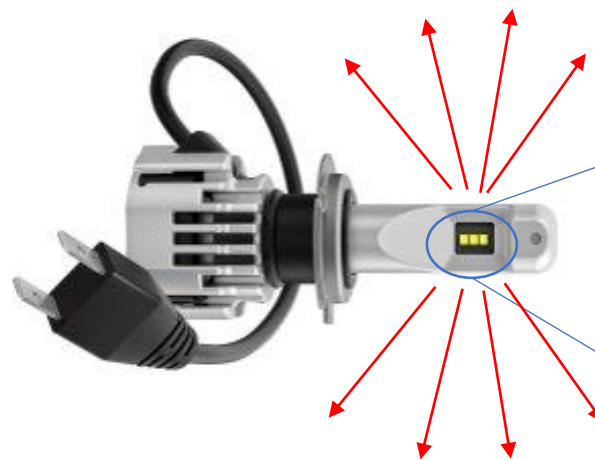
**far field -> normalized intensity distribution**

**near field -> box and contrast requirements**

In which direction is the light emitted?



Where does the light come from?

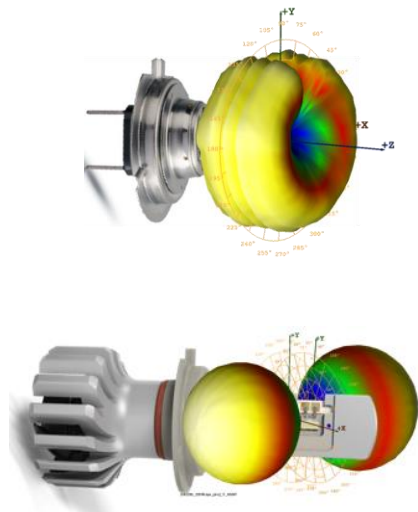


# Currently regulated category and nationally approved products existing H11-LEDr in R.E 5 and H7\_LED with ABG

Key elements discriminating the light source specification and **PROPOSED** amendments to H11\_LEDr

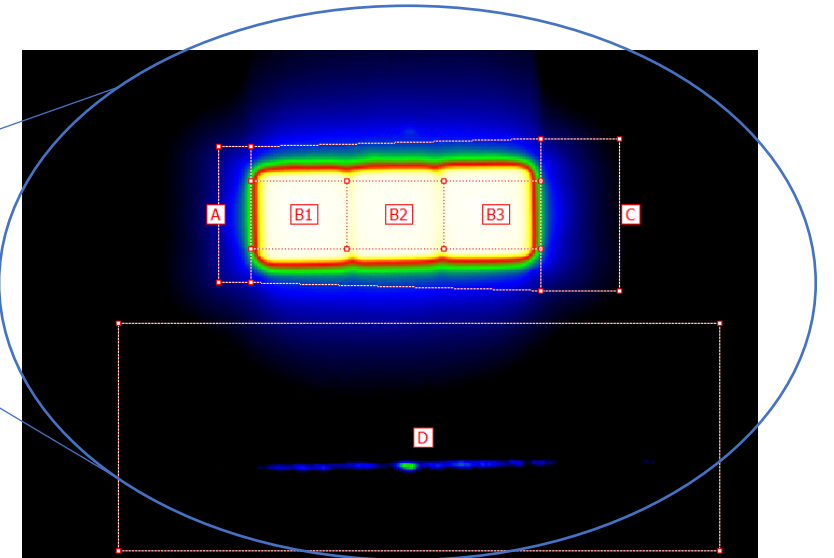
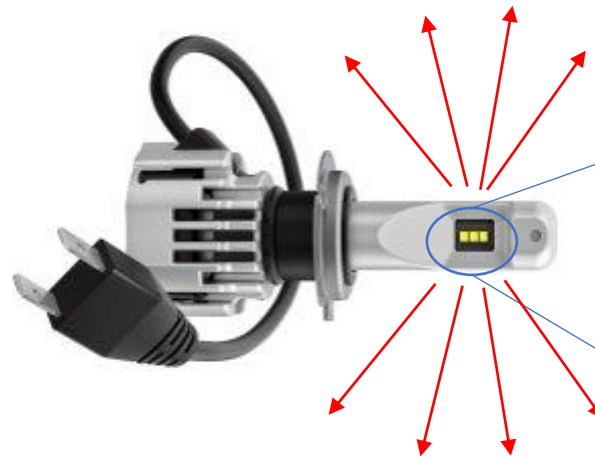
**far field** -> **normalized intensity distribution**

**PROPOSAL:** allow far-field emission characteristic of two LEDs with Lambertian radiation pattern



**near field** -> **box and contrast requirements**

**PROPOSAL:** same LEA as “full-equivalent”  
But only from view “A” and “-A”



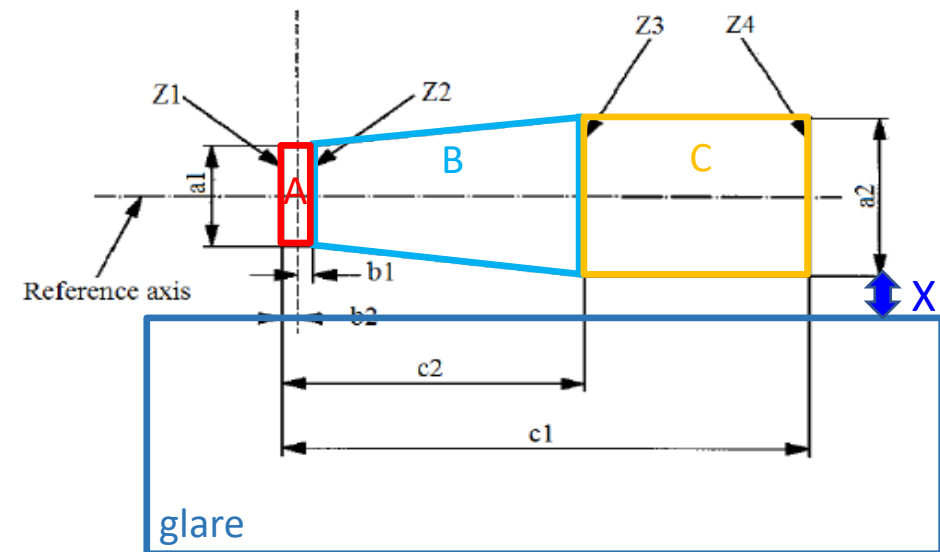
**PROPOSAL:** add maximum distance between two light emitting surfaces

# How to maintain glare control

## Contrast

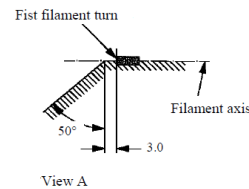
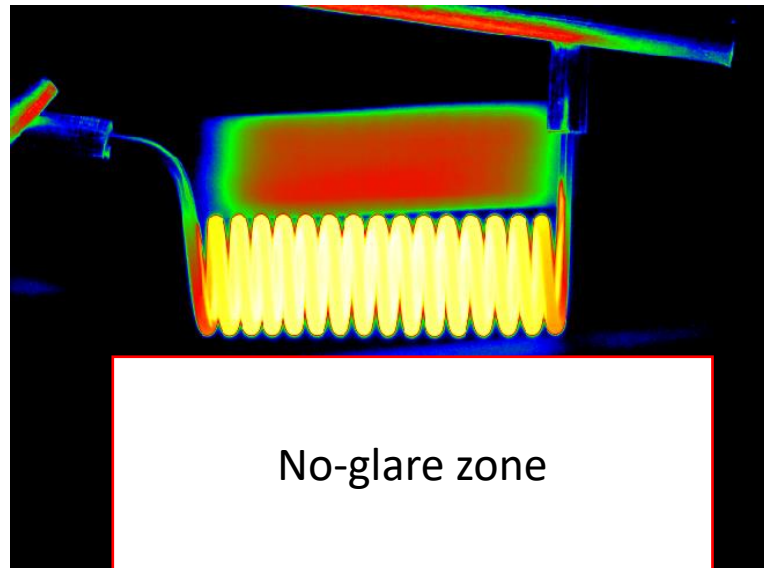
ensuring a sharp cut-off (and controlling the glare)

- Already addressed by full equivalence in R37 today
- Maintain in intelligent equivalence approach



# Contrast

ensuring a sharp cut-off (and controlling the glare)



View A  
Figure 4 – Metal free zone<sup>87</sup>

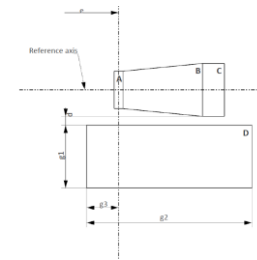
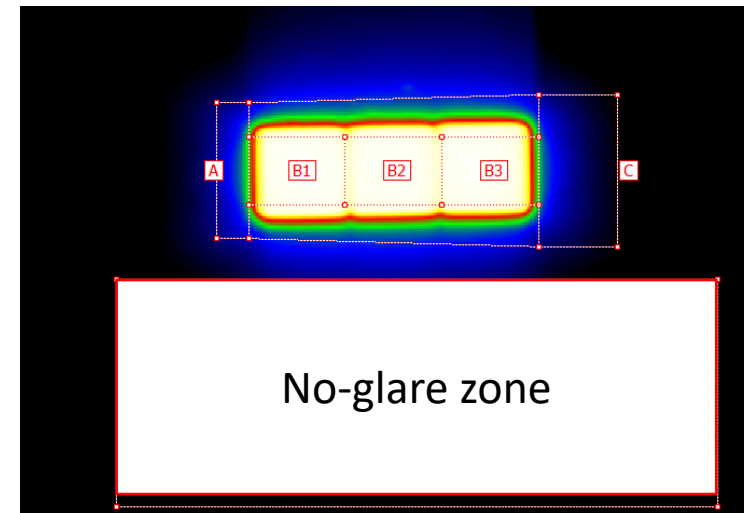


Figure 5: Box definition of the area D (dimensions given in Table 2)

halogen performance



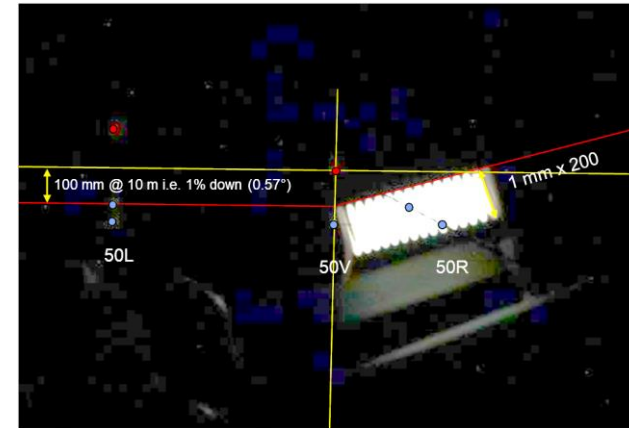
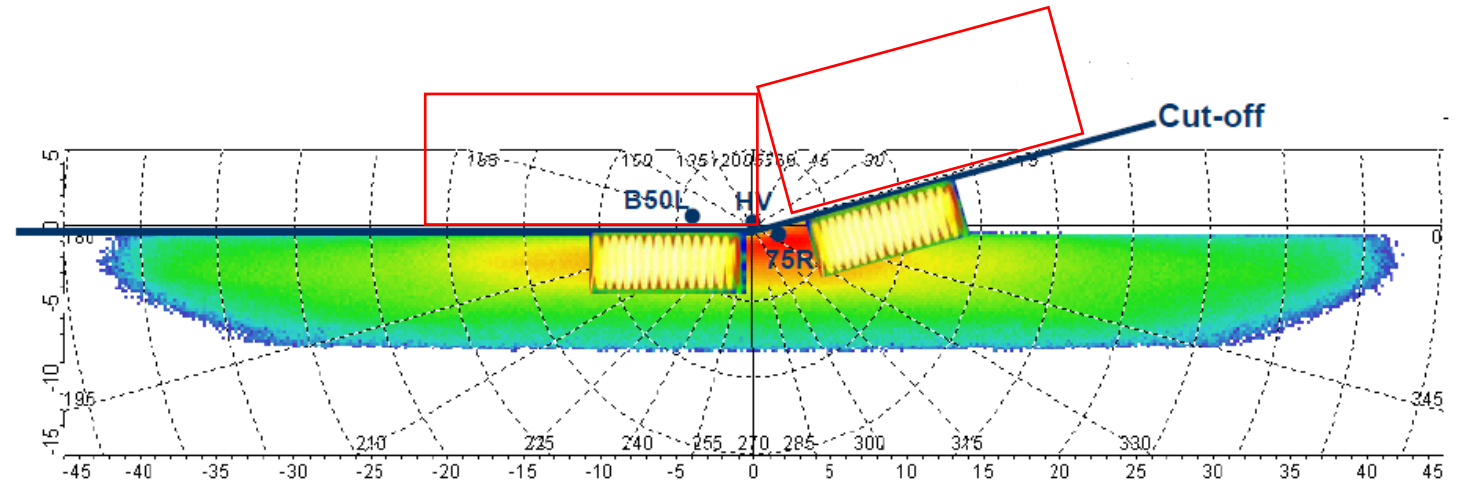
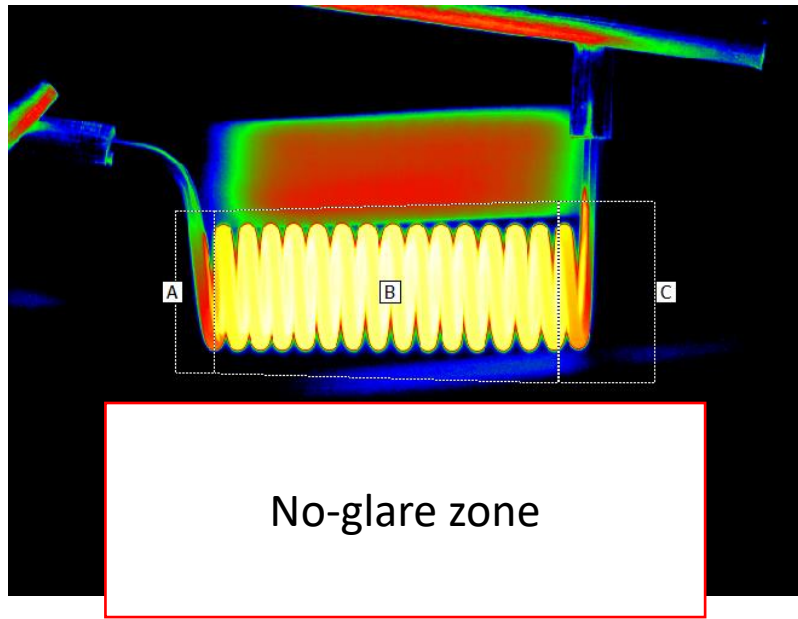
LEDr performance

- already part of R37 today (full equivalence)
- Maintain in intelligent equivalence approach



# How does glare control work

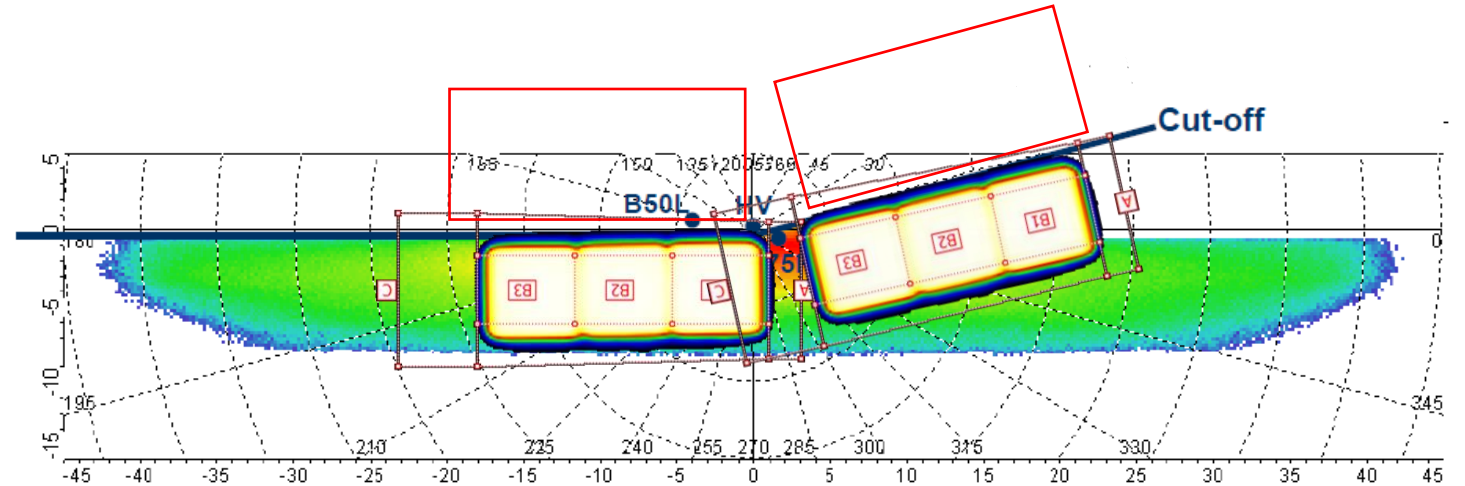
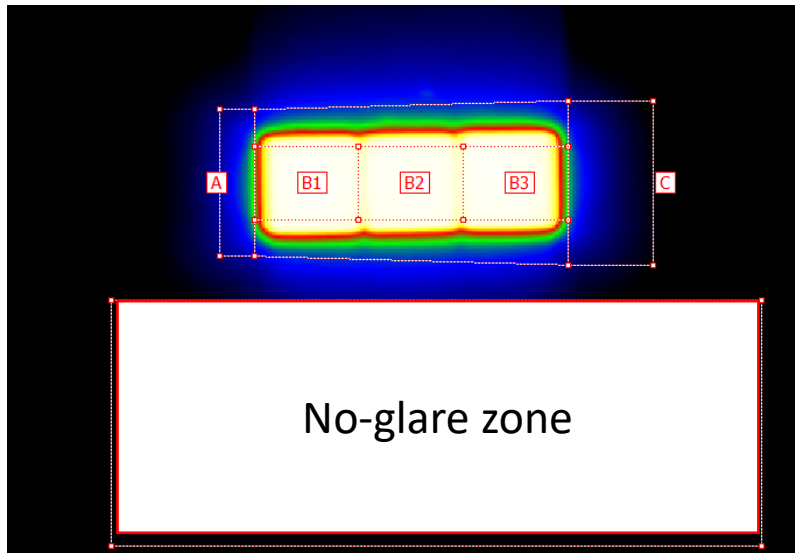
## Halogen and LEDr comparison



No glare zone:  
Realised for filament lamps by a defined geometry  
("metal free zone" and "out-of-center" position)

# How does glare control work

## Halogen and LEDr comparison

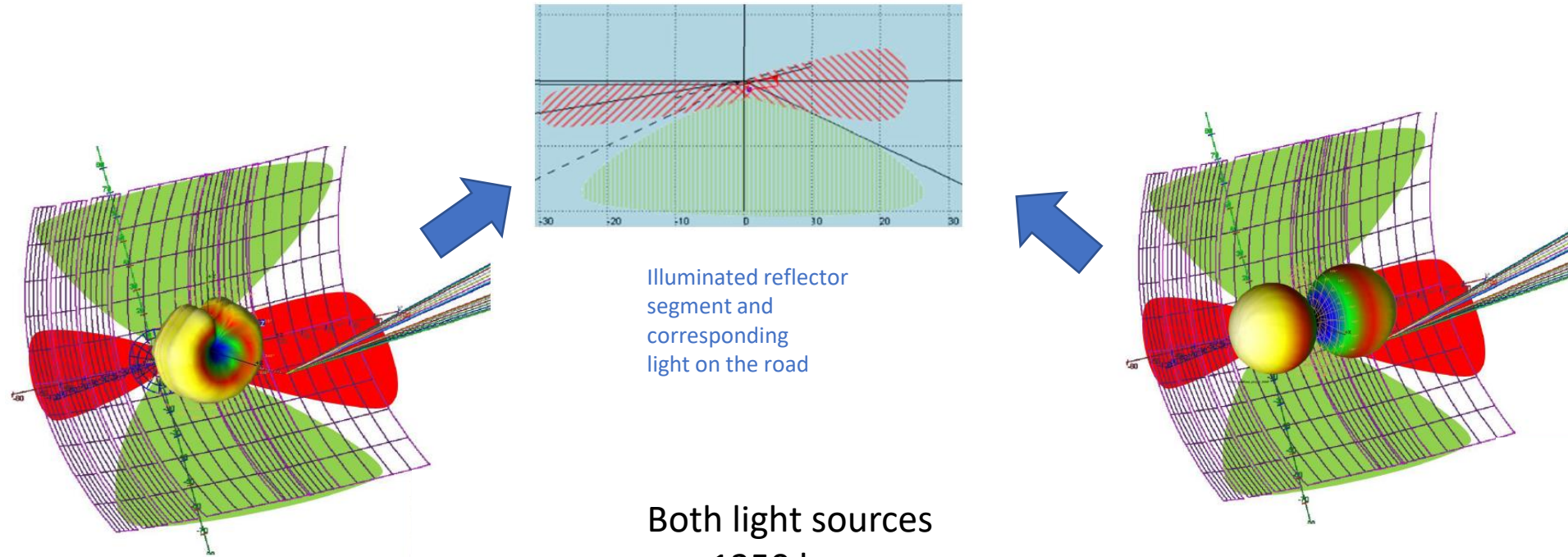


No glare zone:  
Realised for LEDr by a contrast requirement (luminance measurement)

- Already addressed by full equivalence in R37 today

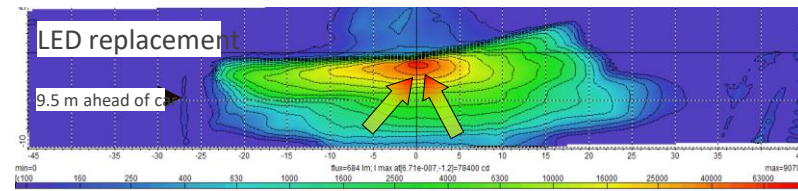
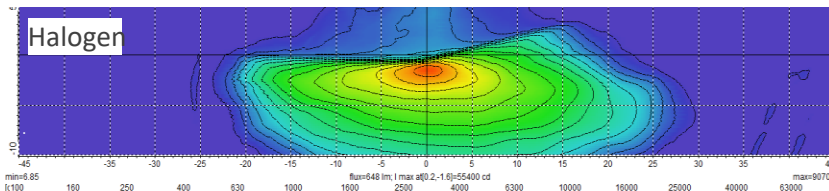


# Side-by-side Halogen and Intelligent Equivalent LEDr Beams on 25 m screen



100 cd/klm in red and green direction

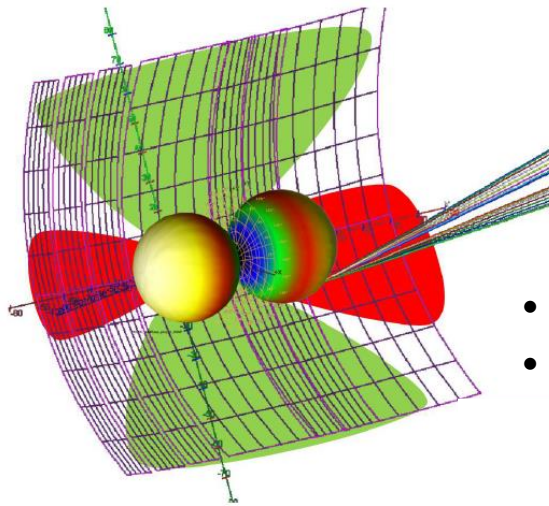
170 cd/klm in "red" direction  
< 80 cd /klm in "green" direction



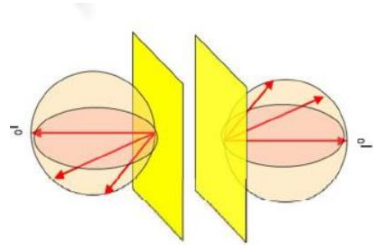


# National approvals (Germany, France, Austria ...)

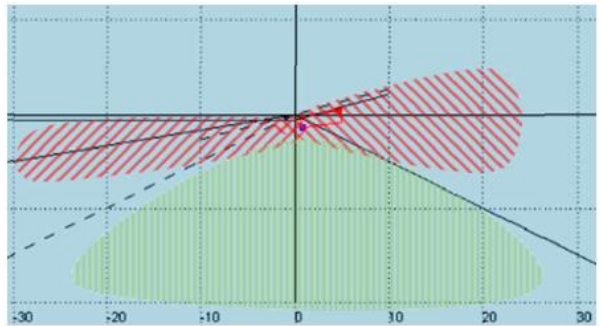
## Deviating from full photometric equivalence



- Less light in green segments
- More light in red segments



Illuminated reflector segment and corresponding light on the road



- Methodology
  - Extensive testing (in headlamps and vehicles)
  - Limited light source specifications
  - Resulting in positive list
- PRO's
  - Enabling legalization of safe LEDr, supporting market surveillance
  - Increased beam performance in many tested headlamps
  - Technically feasible with today LED technology
- CON's
  - Incompatible with some headlamps / vehicles
  - Mis-use may lead to non-compliant beams
  - High effort for industry and approval authorities to maintain the positive list
  - Country-specific approval processes, limited mutual recognition
  - Not yet possible in most countries

# Summary

