Informal document **GRE-68-31** (68th GRE, 16-18 October 2012, agenda item 4(d))

# Poland: comments on OICA comments on GRE/2012/27

### Headlamp Initial Aiming and leveling tolerances influence for road illumination distance

68 GRE, 17 October 2012

GRE/2012/27 proposes changes to ECE R48 to improve the minimum range of visibility, and to replace the artificial 2000lm limit for automatic levelling with more appropriate glare control.

Road illumination distance understand as cut-off crossing with road surface – clear and simple definition in line with present Reg. 112, 98, 123 and aiming practice

### **Proposed changes:**

• To redefine the initial aim and static load-levelling requirements of dip beam cut-off in terms of theoretical range on the road rather than the current % downward inclination.

How is "practical" range guaranteed by present ECE Regulations or by manufactures?

Do drivers know it?

- To reduce aiming tolerance, and delete the additional aiming tolerance in CoP, aligning it with the approval requirement.
- To add a requirement to measure glare values in loaded conditions as part of both Type Approval and CoP, if the resultant aim falls outside permitted tolerance.

Glare is restricted and controlled by headlamp Regulations (112, 98, 123). Till now it is no any reference on vehicle to this defined glare values. According to present requirements of Reg. 48 "on vehicle" glare can differ from regulated in 112, 98 and 123 in uncontrolled manner. It should be clarified how much more glare is accepted and how to ensure it. Artificial 2000 lm borderline does not work.

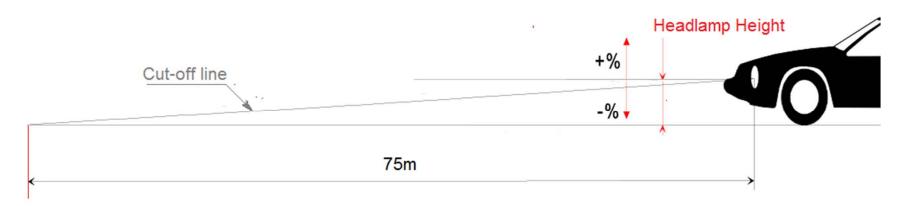
### **Proposed changes:**

 To delete the reference to 2000lm as a threshold for <u>automatic</u> <u>levelling</u>.

Presently are the same restrictions for manual and automatic levelling (2%-2.5%) but practice for automatic levelling is diverse.

 To add a visible warning to the driver, defining what is the minimum <u>visibility distance</u>, if theoretical range is less than 50m.

"Road illumination distance"



 Specified % inclination is (Headlamp height / 75) as a %, rounded to nearest 0.1%.

 Currently: initial aim is specified by the manufacturer, within permitted limits dependent on lamp height. Height bands overlap for tolerance.

min height	max height	%down	
500	1000	1.0% to 1.5%	
800	1200	1.5% to 2.0%	

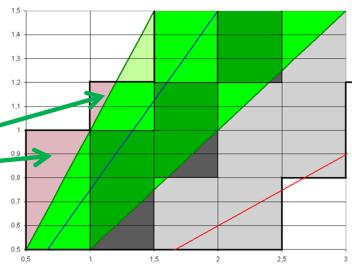
- Under proposal,
  - No overlap between height bands
  - Most headlamps would be aimed <u>higher than at present</u>

It will depend on manufacturers decision and choice of range of amended Reg.48 (30 to100m or 50 to 100m)

It will be safety oriented advantage and goal of amendment because of longer average road illumination distance.

• Risks increased glare.

Not true. Decreased glare comparing present state.



What for are needed overlaps?

min height	max height	%down
488	563	0.7%
563	638	0.8%
638	713	0.9%
713	788	1.0%
788	863	1.1%
863	938	1.2%
938	1013	1.3%
1013	1088	1.4%
1088	1163	1.5%
1163	1238	1.6%

<sports car

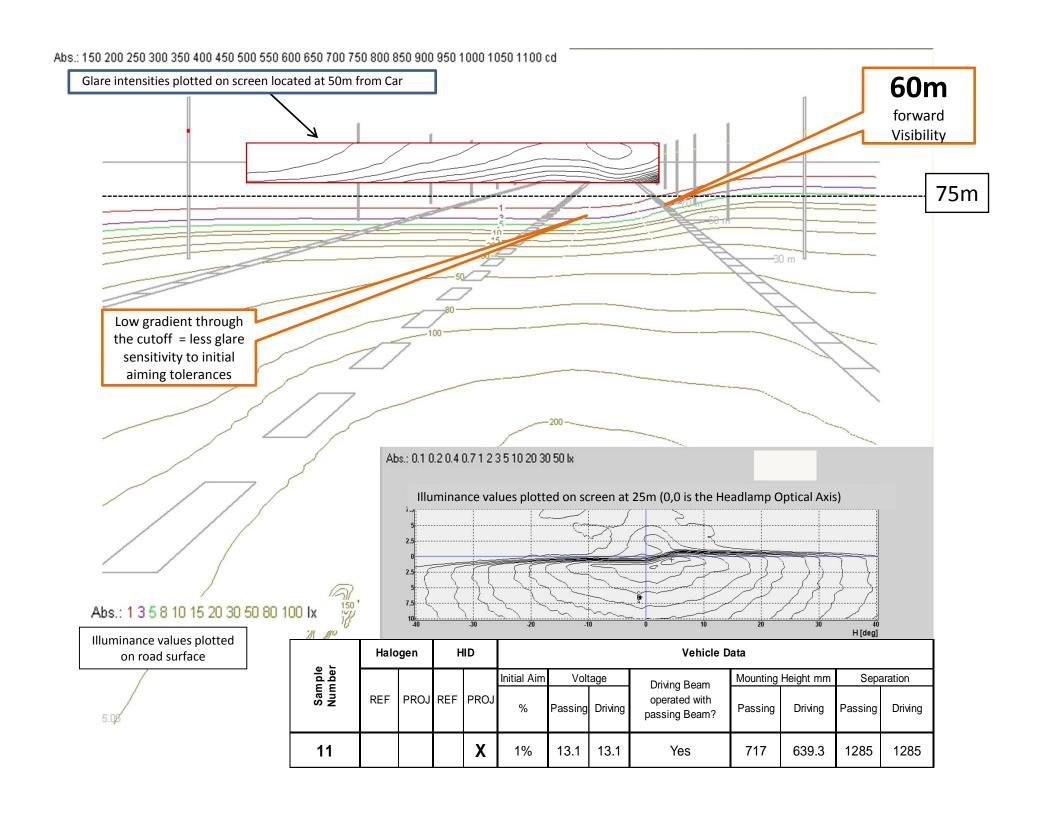
< normal family car

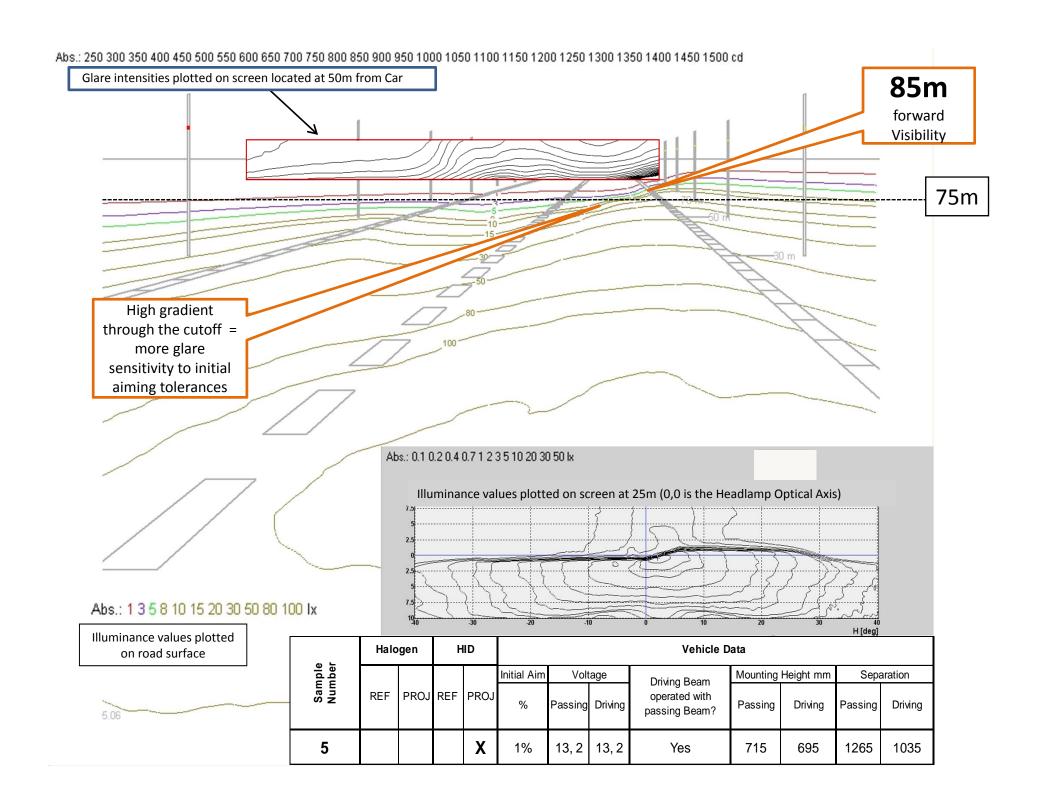


Is it any reference in Reg. 48 to sports car, normal family car, van/SUV? Should be introduced? Why?

### Theoretical Range vs. real visibility

- Is Theoretical Range a good measure of real visibility range?:
- CIE TC4-45 generated a way to measure visibility range: it is significantly more complicated than simply the cut-off intersection, but correlates well with human perception.
- The following examples are taken from the CIE TC4-45 report
  - Two similar R98 headlamps, with similar mounting heights (715mm, 717mm)
  - Both are aimed at 1.0% down. This is the same value of aim that would apply under the proposal for these headlamp heights.
  - Ranges are calculated according to TC4-45 method.





### Theoretical Range vs. real visibility

- Both lamps have a theoretical range of 75m
  - Sample 11 has TC4-45 visibility range of 60m
  - Sample 5 has TC4-45 visibility range of 85m
- Conclusion: theoretical range is a poor measure of real-world visibility

### Theoretical Range vs. real visibility

• Conclusion: theoretical range is a poor measure of real-world visibility

To objectively assess aiming/leveling results of GRE/2012/27 appropriate are calculations for <u>lowest allowed</u> leveling according present requirements <u>2.5% down aiming</u>. How big will be differences between both headlamps and where will be 3lx position on left side?

Have in mind <u>inverted square law</u>. <u>1% aiming is inappropriate</u> for this situation.

By 2.5% aiming results should be very closed to 28 m

In GRE/2012/27 is proposed: "It is also possible on the same way to declare <u>a longer</u> than minimum required road illumination distance according applicant knowledge"

Could be modified "It is also possible on the same way to declare a <u>longer</u> or <u>shorter</u> than minimum required road illumination distance according applicant knowledge"

# Tolerance with load levelling to be 50m to 100m theoretical range (6.2.6.1.2) for both approval and CoP

- Currently total load levelling tolerance is 2.0% approval, 2.6% CoP
- Manufacturer may define initial aim to optimise levelling results

Current Approval				
min height max height		%down		
500	1000	0.5% to 2.5%		
800	1200	1.0% to3.0%		

Current CoP				
min height   max height		%down		
500	1000	0.2% to 2.8%		
800	1200	0.7% to3.3%		

### Tolerance with load levelling to be 50m to 100m theoretical range (6.2.6.1.2) for both approval and CoP

- Proposal is shown expressed as %.
  - Initial aim is defined by regulation
  - Highest permitted aim with levelling unchanged at -0.5%
  - Corresponds to a reduction in load levelling tolerance for most cars of 60-75%

Proposal						
	min angle	set	max angle			
H(mm)	<b>100</b> m	"75m"	50m	total tol		
500	-0.5%	-0.7%	-1.0%	0.5%		
550	-0.6%	-0.7%	-1.1%	0.6%		
600	-0.6%	-0.8%	-1.2%	0.6%		
650	-0.7%	-0.9%	-1.3%	0.7%		
700	-0.7%	-0.9%	-1.4%	0.7%		
800	-0.8%	-1.1%	-1.6%	0.8%		
900	-0.9%	-1.2%	-1.8%	0.9%		
1000	-1.0%	-1.3%	-2.0%	1.0%		
1200	-1.2%	-1.6%	-2.4%	1.2%		

It is alternative in GRE/2012/27:

"The crossing distance could be lower but not less than [25 m or 30m] under the condition that there will be <u>information for driver</u>

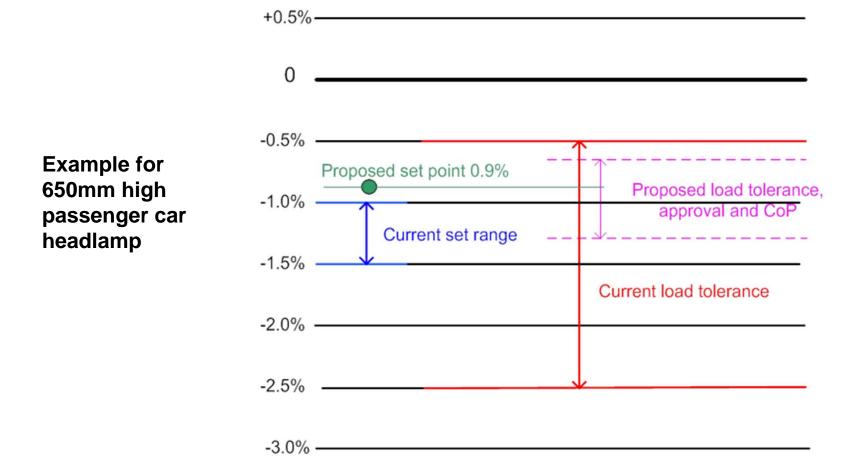
It should be carefully verified. But... What is the problem?

<u>Manufacturers convenience</u> (because not technical possibility)

or ...

**SAFETY OF MILIONS DRIVERS AND PEDESTRIANS** 

### **Tolerance with load levelling**



 To consistently meet CoP requirements, initial aim and levelling system need to be repeatable with a standard deviation of better than 0.1%.
 Repeatability of suspension system alone is not this good.

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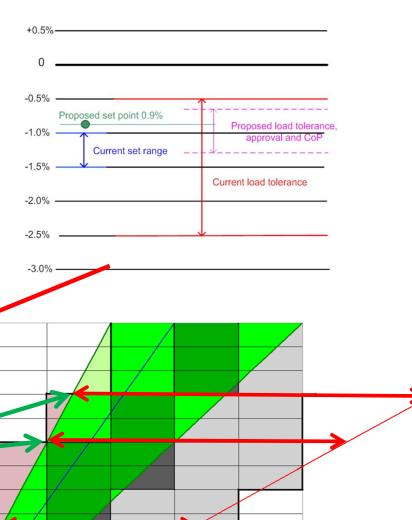
Repeatability of suspension system alone is not this good.

Repeatability (tested in Motor Transport Institute including performance of suspension) for automatic leveling for many cars was much better than 0.1%

For same (van/SUV/delivery trucks) tolerances are bigger

For some cars (sport cars) are lower

### **Example for 650mm high passenger car headlamp**



# 6.2.6.1.3 requires that if, under loading conditions of Annex 5, aim falls above the 100m range, glare must be measured

- This is assessing the glare with the headlamp aimed as it would be under Annex 5 load conditions. Measurement to take place during headlamp type approval.
  - But at time of headlamp Type Approval, R48 inspection has not taken place, so the aim of the headlamp under Annex 5 conditions is not known.

At time of headlamp Type Approval, could be very easy measured and additionally reported:

- what are the highest possible aiming/ mounting height values

### **Deletion of 2000lm requirement**

Current regulation para 6.2.9 prohibits the use of para 6.2.2.2 manual levelling option with LED or >2000lm light sources

- Proposal deletes this prohibition
  - Provided that 50-100m theoretical range can be achieved by manual levelling, manual levelling would be permissible for any headlamp.
- GTB working group is currently reviewing visibility and glare: it would be better to await their outcome.

GTB working group reviewed <u>GLARE ONLY</u> (Klettwitz tests) in respect to <u>obligatory automatic leveling</u>.

Results are as was easy to theoretically predict: significant influence of pitch angle. No significant influence of light source flux.

No visibility range research were done till now.

It is easy to predict that cut-off position at 20m before vehicle (or less for CoP reasons) cannot guarantee visibility for speed of 100 km/h

### Warning message

 If theoretical range under Annex 5 loading conditions falls below 50m but above 25m, a warning notice is to be placed in the car, declaring the minimum theoretical range as a minimum "visibility distance"

> Visibility distance does not correlate directly with theoretical range (see above).

For short distances correlates very well Please verify before reporting

#### GRE/2012/21 proposed changes to ECE R48 (1 of 3):

To redefine the initial aim and static load-levelling requirements of dip beam headlamps in terms of theoretical range on the road rather than the current % downward inclination.

#### **Conclusion:**

- Redefining the aim point will raise the aim for most passenger cars
   This may not give the desired visibility range
- To prevent this causing increased glare, aiming and levelling tolerances must be tightened
  - Industry needs aiming and levelling capability data to identify if this tolerance tightening is practicable.

#### **Conclusion:**

Redefining the aim point will raise the aim for most passenger cars
 This may not give the desired visibility range

Not proved. Illegitimate statement.

- To prevent this causing increased glare, aiming and leveling tolerances must be tightened
  - <u>Industry needs aiming and levelling capability data to identify if this tolerance tightening is practicable.</u>

It is not a problem to identify.

It is possible esy measure values for vehicles offered on market.

It is simple and it was done.



# THANK YOU FOR YOUR ATTENTION