Polish comments to GRE-83-24
Poland clearly expressed in GRE-81-22 the comments, questions and advice to IWG-SLR regarding Stage 2 of „simplification” in regard to RID. We regret to say that these important issues have been ignored.

Therefore Poland is repeating in simple way the minimum general expectation regarding **photometric requirements** of **Stage 2 for RID** based on minimum safety requirements, basic photometry knowledge, logical reasoning, and common sense.

- It should be described the **only one** „minimum for safety” set of requirements. Basically it is „road illumination (RI) and „glare protection” (GP). If there are any special conditions (like speed limit, fog or adverse weather) they should be unambiguously defined to be recognised by driver during driving in real traffic.

- It is illogical to require more for any device (class) than is permitted to be legally used under the same conditions as any other authorized and defined device.
• Should be defined only one class for general use. If this class is the Basic /”C” Passing beam and is sufficient to illuminate the road at night and there is no restrictions for use of this class e.g. speed limit, then the additional requirements for „other classes” should concern only traffic conditions (GR). This means that any driving beam should meet only Basic /”C” Passing beam RI requirements when for driving beam should be not provisions for glare GR except the maximum luminous intensity for whole set of headlamps only.

• As result should be only above requirements for whole set of (any) driving beam(s). Therefore there is no reason for additional (auxiliary, secondary, etc.) driving beam because it should be free for manufacturer discretion.

• But if Basic /”C” Passing beam is insufficient for safe driving with any speed (which is maybe possible with one or more driving beam/s) such restrictions (like speed limit) should be integral part of Basic /”C” Passing beam requirements
There is no justification for **CS** and **DS class** for motorbikes. They should have (single or set of) headlamp(s) meeting together doubled requirements for **Basic/”C” Passing beam**. Otherwise there is technology discrimination for any of non motorbike vehicles. Or requirements for one of **CS** or **DS class** should be enough for pair/set of any other vehicle (car, heavy good etc.) and should replace **Basic/”C” Passing beam**
• **Low speed /”V” Passing beam** should be associated with clear value of speed limit but not with vehicle category („design” factor)

• **Low speed Driving beam** should be associated with clear value of speed limit different than for **Low speed /”V” Passing beam**. If there is the same speed limit as for **Low speed /”V” Passing beam** there should be no separate RI photometric requirements but for **Low speed Driving beam** only GP limits should be removed form requirements for **Low speed /”V” Passing beam**

• **AS and BS class for mopeds** should be replaced with **Low speed /”V” Passing beam** with doubled values for single lamp (set) or clear but different speed limit than for **Low speed /”V” Passing beam** should be required and justified
• **Motorway/”E” Passing beam** should be associated with clear value of speed limit different than for **Basic/”C” Passing beam**. If no speed limit shall be associated with **Basic/”C” Passing beam** than **Motorway/”E” Passing beam** should have the same **RI** requirements like **Basic/”C” Passing beam** but only **GR** could differ.

• **ADB class** should have the same (minimum) requirements for **RI** like **Basic/”C” Passing beam** if it is sufficient to use with any legal driving conditions (speed). If not then restrictions for use (speed limit) for **Basic/”C” Passing beam** should be introduced. **GR for ADB Requirements should replace existing GR of Basic/”C” Passing beam** under condition that (GR) are possible to objective testing for whole ADB system in the way effectively representing real traffic conditions.
Photometric requirements for **Fog beam** should be supplemented by specific conditions of use which are possible to objective discrimination by any driver. E.g. **speed limit**, density of fog and other necessary criteria should be integral part of requirements description. It cannot be left to discretion of national law because photometric requirements should unambiguously describe photometric behaviour and safety which are common and related to lighting performance and weather condition only.
Thank you for attention