



August 27, 2003

Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW  
Nassif Building  
Room PL-401  
Washington, DC 20590-001

Re: NHTSA Docket No. 03-15651

Dear Sir or Madam:

Valeo Sylvania provides automotive exterior lighting for OEM automotive manufacturers and the aftermarket. We would like to take this opportunity to comment on the request for comments published July 17, 2003, in the Federal Register Volume 68, No. 137 regarding two requests for interpretation on replacement automotive lighting equipment.

Valeo Sylvania appreciates the approach of the Chief Counsel of the NHTSA to request comments on these interpretations.

While Valeo Sylvania agrees with many of the issues raised by the Chief Counsel of the NHTSA with regard to replacement equipment, we do not agree with the final interpretation as it is issued in NHTSA Docket No. 03-15651. Replacement equipment should comply with the applicable FMVSS 108 requirements and the vehicle should continue to comply with FMVSS 108 after installing replacement equipment.

However, there is a desire from vehicle owners to customize or improve the performance of their vehicles. Due to this, many aftermarket lighting kits are sold that have different style, appearance, and potentially improved performance. As long as these kits meet the requirements of FMVSS 108, Valeo Sylvania feels these lamps should be allowed to be sold and installed on vehicles.

FMVSS 108 S5.8.1 states "...each lamp, reflective device, or item of associated equipment manufactured to replace any lamp, reflective device, or item of associated equipment on any vehicle to which this standard applies, shall be designed to conform to this standard." As stated in the proposed interpretation letter in the request for comments, "whenever a manufacturer designs a lamp to replace a lamp on a vehicle to which [FMVSS 108] applies, the manufacturer must design that lamp to ensure that the vehicle will continue to comply with Standard No. 108 when the replacement lamp is installed.

Valeo Sylvania feels that aftermarket replacement kits that change the style or appearance of the OEM lamp are permitted according to FMVSS 108 as long as these lamps comply with FMVSS 108 and the vehicle continues to comply with FMVSS 108 after installation of the lamps. As long as these lamps comply with FMVSS 108, we do not see a need to restrict a vehicle owner's options for changing the style or appearance of their vehicle to that of the OEM equipment.

In summary, Valeo Sylvania agrees with the NHTSA that aftermarket replacement lighting must meet FMVSS 108 requirements when installed on the vehicle. However, we do not feel there is a need to restrict the style and appearance of aftermarket replacement lighting. The requirements for aftermarket replacement lighting should be performance based only.

Valeo Sylvania appreciates the opportunity to respond to this request for comments from the NHTSA. Please feel free to contact me if you have any questions regarding Valeo Sylvania's responses or would like to discuss them.

Sincerely,

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