



U.S. Department
of Transportation
National Highway
Traffic Safety
Administration

Memorandum

91715

Subject: INFORMATION: Submittal to Docket No. NHTSA 98-4124

Date:

AUG 19 1998

Notice 1

See Medlin

From: **Jere Medlin**
Safety Standards Engineer

Reply to
Attn. of:

To: Docket Section

THRU: ~~Stephen R. Kratzke, Director~~
Office of Crash Avoidance Standards



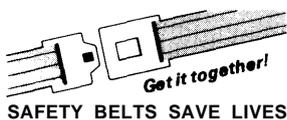
VIA: Frank Seales, Jr.
Chief Counsel

RECEIVED
 AUG 20 PM 2:45
 A,

Please submit to Docket No. NHTSA 98-4124, Notice 1 the attached nine comments on the proposed rulemaking on **DRLs**.

9 attachments (w/2 copies)

JK
37V



NPS

August 4, 1998

Dr. Ricardo Martinez
NHTSA
400 Seventh Street, SW
Washington, D.C. 20590

Re: Daytime running lights

Dear Dr. Martinez:

I read with interest the enclosed article about the intensity of automobile daytime running lights because I also have found them very irritating (Saturn, in particular). I just did not know to whom a complaint should be sent. I am very glad to know that the problem is being addressed and the intensity will be reduced. I just wish that all cars would have to have the current lamps replaced with lower intensity lamps by the end of this year.

Sincerely,



Jan Knight
Dallas, Texas

EXECUTIVE SECRETARIAT
1998 AUG 12 PM 4:46
NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.

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Agency wants to dim cars' bright lights

August 4, 1998
 Web posted at: 9:40 a.m. EDT (0940 GMT)

WASHINGTON (AP) -- A government safety agency wants to turn down the brightness of daytime running lights in new autos after receiving hundreds of complaints about glare.

The National Highway Traffic Safety Administration plans within two years to cut the maximum light intensity allowed for the front safety lights on new vehicles to roughly half that allowed now. In four years, the intensity would be reduced to a quarter of today's brightest running lights.

The agency is seeking public comment on the proposal before it issues a final rule.

"These changes are a response to hundreds of complaints from the public about glare from these optional devices," Dr. Ricardo Martinez, head of NHTSA, said Monday. "Older drivers should be particularly pleased with the proposed change because their eyes tend to be sensitive to glare."

NHTSA has received more than 400 complaints about glare since 1993 when the agency first allowed running lights, which resemble headlights.

If the proposal becomes final, it would bring the maximum intensity of daytime running lights in line with European guidelines.

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*NHTSA
 Office of the Administrator (NAO-10)
 400 Seventh St. SW
 Washington, DC 20590*

NHS

EXECUTIVE SECRETARIAT

1998 AUG 12 AM 9: 12

NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.

WILLIAM H. THOMSON
2348 Foliage Lane
DYER, IN 46311

August 7, 1998

National Highway Traffic Safety Administration
400 7th Street S.W.
Washington, D.C. 20590

Attn: Dr. Ricardo Martinez
Agency Director

RE: Rule making of dimming of auto running lights

Dear Dr. Martinez:

I read with interest a recent newspaper article in which your Agency is proposing to issue a rule requiring U.S. Auto Makers to significantly reduce the intensity of auto running lights which are used during daylight hours. I agree with your Agency in doing this since I find these daylight running lights to be a great nuisance and irritation. In general, I feel that the new headlights including these daylight running lights are extremely bright, far brighter than is necessary for normal road traffic. They are an irritation to my eyes and I am sure to many others. If lights are needed on automobiles during daylight hours, I don't see why normal parking lights are not sufficient. I have no trouble in seeing an auto in front of me or behind me in the mirror.

The second thing I object to with these lights is that they intimidate people, forcing them to drive faster than they normally would because there is the impression that the person behind with the lights on is in a great hurry. I feel this encourages faster driving on all the roads which again increases danger to all parties concerned. I, therefore, support you in lowering the intensity of both headlights and daylight running lights as much as possible because of these concerns.

August 7, 1998
National Highway Traffic Safety Administration
Page 2

I do however have a complaint with your Agency. How is it possible for the average citizen to comment on this rule as you request if there is no address given or information as to how we are to do it. I had to get your address by calling a government number for general information. I also tried to obtain the phone number of your regional office in Olympia Fields, IL and learned that they have an unlisted number. I do not understand why they have an unlisted number if they are in business to take care of public traffic safety concerns. I am sending a copy of this letter to your regional director with my complaint asking that they be more accessible to the general public in hearing their concerns.

If you have any questions or comments concerning my letter, please feel free to write to me at the above address. Thank you for your interest.

Very truly yours,

A handwritten signature in black ink, appearing to read 'William H. Thomson', with a long horizontal flourish extending to the right.

William H. Thomson

cc: Regional Director
National Highway Traffic Safety Administration
19900 Governors Drive
Suite 201
Olympia Fields, IL 60461

NATION

U.S. to dim auto running lights

ASSOCIATED PRESS

WASHINGTON—A government agency wants to turn down the brightness of daytime running lights in new autos after receiving hundreds of complaints about glare.

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be reduced to a quarter of today's highteat running lights.

The agency is seeking public comment on the proposal before it issues a rule.

"These changes are a response to hundreds of complaints from the public about glare from these optional devices," Dr. Ricardo Martinez, head of the agency, said.

"Older drivers should be particularly pleased with the proposed change because their eyes tend to be sensitive to glare."

OCA

233 Falcon Ridge Drive
New Kensington, PA 15068
August 8, 1998

L. Robert Shelton
Associate Administrator for Safety Performance Standards
National Highway Traffic Safety Administration
400 Seventh Street S. W. (HEF-30)
Washington, DC 20590

Dear Mr. Shelton:

I hope that the NHTSA will adopt its proposal to limit headlights to a maximum of 50% of low-beam intensity on all vehicles using headlamps as DRLs built on or after January 1, 2000. As is now, the use of DRLs would not be mandatory. I think that enacting such a regulation would be the most cost-effective method to minimize complaints on glare emitted by headlamps being used as DRLs. I am also proposing that steady burning turn signal lamps and specifically designed auxiliary lamps still be permitted as DRLs as long as their output does not exceed the aforementioned 50% intensity of low-beam headlamps. DRL height limitations would also continue to be enforced. Also, the use of front parking lamps or auxiliary driving lamps would not be permitted at the same time that headlamps are being used as DRLs.

Sincerely,



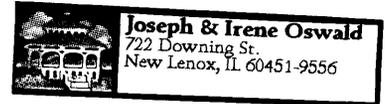
Willard A. Pelican

National Highway
Traffic Safety
Administrator

EXECUTIVE SECRETARIAT

1998 AUG 12 AM 9:04

NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.



MS
8-4-98

Dear Sir(s) or Ms.

Please be aware of an on going and potentially worse problem, yet to come - "DAY TIME HEADLIGHTS" on new automobiles, vans and trucks.

These lights are more of a detriment and hazard than a safety measure. The lights are too bright, blinding and distracting.

These lights almost cause us an accident on two occasions - lets us explain:

- Facing a Saturn auto (with the day time headlights on) at an intersection - This vehicle had its left turn signal on which we did not see because of being blinded by the day time lights - The signal blended in with the day time lights.

We did not know this Saturn was to turn until we made a move based on "NO" sign - Cars bumped - no damage - We were lucky this time.

- Driving on a two lane highway (East & West) a sports truck Blazer/Bronco or similar blinded us with the day time headlights, we could not see the automobile behind the truck, which decided to pass the truck. Facing the on coming car head on we had less time to respond to make room or slow down so that the on coming car could pass and return to the proper lane.

approximately two seconds were lost in decision making
Three seconds could have been fatal.

Day time automobile/truck/van etc headlights are
dangerous and should be tone down considerably or
best yet eliminated. Many Many people are agreeing

Also please be aware —

Night Time Headlights are getting brighter and
blinding - There are times in rural areas the
blinding causes a few seconds one cannot see the road
in front of the vehicle.

We need your help in investigating the Headlight
problems -

Please eliminate the use of day time headlights
take it from our experience.

Thank you,

Joseph W. Oswald

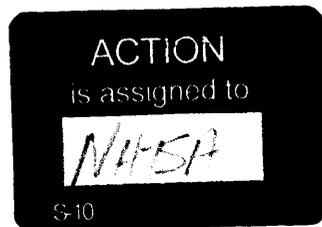
From: Mrs. S. Shales
1620 Blossom Road
Rochester, NY 14610

To: Secretary of Transportation
Washington, D.C.

EXECUTIVE SECRETARIAT

1978 AUG 12 AM 9:02

NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.



DPS

August 2, 1998

Dear Sir

There are several points about which I have wanted to write to you for several months and finally decided to, because they are bothersome.

First, I don't understand why some newer cars are authorized to have headlights go on automatically whether or not they are needed, in broad daylight and in bright sunshine, which is when they are absolutely not needed. I find that the bulbs on these headlights are so bright that they are blinding, when the car is facing me or even if I see it through the rearview mirror. What on earth is the purpose for this? Someone told me it was done by General Motors for "additional safety". Lights that are blinding to other drivers, in bright sunshine on top of it, are ~~not an addition~~ to safety, on the contrary. I hope that this is not going to become some compulsory measure for all cars. I know that they do this in Canada, but why do we have to copy something stupid?

There are other concerns which are certainly more important as far as safety goes: the increasing quantity of drivers who drive with one hand on the steering wheel and hold a telephone in the other hand. This is a lot more dangerous than having no headlights on in bright sunshine, I would think.

Their driving attention is further minimized when they concentrate on their phone conversations. Why is this allowed? And if it isn't, why is it never enforced?

My last concern is the fact that the increasing number of very large and high cars (vans) are already annoying when in front of you, because their size diminish your view area, but a lot of them have dark tinted windows, and that is really a problem because you really can't see anything when stuck behind one of those things. Lastly, I should mention that mudguards (or mudguards) should be compulsory on all vehicles. Too many don't have them and splash you inordinately with salty mud in the winter or often project stones and pebbles into your windshield, which is also unsafe!

Sincerely yours Svetlana Skalen

MooKown Farm

Robert M. McKown

Box 299

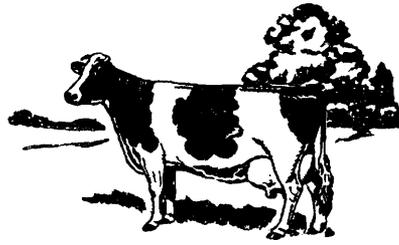
Sandy Creek, New York 13 145

Phone: (315) 387-3128 (eve.)

~~Box 113~~

~~Belleville, New York 13611~~

~~Ph: (315) 848-5651~~



NPS

REGISTERED
HOLSTEINS

August 5, 1998

Friends,

It is good to know that you are getting complaints on daytime running lights.

They should not only be reduced in brightness, they should be banned entirely!

Driving along on a nice, sunny day with lights on is something only government could come up with!

I drive 25,000 miles a year and the glare I get from headlights at night and on dark, rainy days is plenty for me.

If we are going to use European guidelines, are we going to be allowed to drive 100 miles per hour also?

Thanks,

Robert M. McKown

EXECUTIVE SECRETARIAT
1998 AUG 12 AM 9:03
NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.

NPS

4 August 1998

Dr. Ricardo Martinez, Director

The National Highway Traffic Safety Administration
400 7th Street SW
Washington, D.C. 20590

Subject: Intensity of Daytime Running Lights: Motorcycle Lights.

Dear Dr. Martinez:

By far the most brilliant and blinding are the Motorcycle running lights in use today in California. They are truly painful and certainly distract one's attention to important safety factors for the oncoming drivers.

I asked the California Department of Motor Vehicles and received their reply -- -- That there is No California Law prohibiting vehicles from using their "high beams" in daylight hours. I consider their opinion dangerous and certainly distressing. I have high beams on one of my cars which I hoped could remind motorcyclists with brilliant lights; this failed to have any effect. Cyclists drive with dark lens helmets, apparently impervious to the brilliance of my flashed lights.

Your Office has plans to regulate intensity of running lights on new vehicles. I urge you to add such controls to running lights of ALL motorcycles. They are a painful road hazard and appear to be unrecognized by motorcyclists in this state.

I applaud the action of your administration.

Sincerely,

Andrew A. Benson
Professor

EXECUTIVE SECRETARIAT
1998 AUG 12 AM 9:10
NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.

August 4, 1998

EXECUTIVE SECRETARIAT

1998 AUG 12 AM 9:08

NATIONAL HIGHWAY
TRAFFIC SAFETY ADMIN.

NHTSA
Office of the Administrator
NAO-101
400 Seventh St. SW
Washington, DC 20590

Dear Administrator:

I have just read that the NHTSA has taken action to decrease the glare from running lights over the next four years. I thank you very much. Had I known that we could come flying to you and be heard I would have contacted you years ago. Again, thank you very much.

Sincerely,

Paul Carlson
2709 North 34th Street
Omaha, Ne 68112

JCW CONSULTING

July 28, 1998

Mr. Allan F. Williams, Ph.D.
Senior Vice President, Research
Insurance Institute for Highway Safety
1005 North Glebe Road
Arlington, VA 2220 1

Dear Mr. Williams,

I received your July 1 response to my June 23 inquiry on the IIHS position on DRLs, subsequent to the distinctly safety-negative December 1997 DRL report from HLDI.

It was very disappointing that your letter did not attempt to answer my specific questions, and it is quite disturbing to not see a major change in the IIHS position of support for today's high-glare DRLs, given the obvious safety-negative results of the HLDI study.

You state (incorrectly) that the HLDI report found no consistent pattern in personal injury claim frequencies for like-to-like vehicle pairs, with and without DRLs, despite the facts:

- Relative claim frequency (100 average base) went from 92 to 97 on the 1994-1995 pairs
- Relative claim frequency (100 average base) went from 80 to 83 on the 1995-1996 pairs
- Of 27 models studied, 16 (or 59%) showed an increase in personal injury claims
- Of nine models with significant changes, seven increased claims and only two decreased

While anyone would obviously see that the results were not totally uniform, taken in the aggregate it is very clear that the unfortunate owners of the DRL equipped vehicles had a higher probability of filing a personal injury claim than the owners without DRLs.

NHTSA has received hundreds of pages of comments that oppose today's high-glare DRLs, and your own research shows your chances to file an injury claim are higher in one of those vehicles, compared to otherwise identical models without DRLs. The IIHS position on the currently allowed high-glare DRLs does not make logical sense, and may extend the time in which further unnecessary injuries will occur to policyholders of your member companies.

I find it appalling that the IIHS would still support the current DRL rules, which allow lights with very high glare levels that frequently impair the vision of other drivers, given the overall safety-negative results from your own research group. It should not be IIHS policy to promote injuries in group A to get a highly speculative reduction in injuries in group B.

Sincerely,



James C. Walker

cc: Various NHTSA executives, NMA, selected press, and others

2050 Camelot Road
Ann Arbor, MI 48104
USA

Telephone 7346607042
FAX 7346633479
e-mail JCWConsult@aol.com

**INSURANCE INSTITUTE
FOR HIGHWAY SAFETY**

July 1, 1998

Mr. James C. Walker
2050 Camelot Road
Ann Arbor, MI 48104

Dear Mr. Walker;

I am responding to your recent letter concerning the safety benefits of daytime running lights (DRLs) and their effect on automobile insurance losses.

Daytime running lights increase conspicuity and lower the chance of another vehicle running into a DRL-equipped car. However, DRLs will do little if anything to reduce DRL-equipped cars from striking another car or object. Thus, the motorists who will benefit from DRLs are those who might otherwise run into cars they hadn't noticed.

The Highway Loss Data Institute's (HLDI) report on DRLs found no consistent pattern in personal injury protection claim frequencies in vehicles after DRLs were introduced. As the report indicates, the absence of a reduction in personal injury protection claim frequencies is not surprising because claims for striking vehicles, single-vehicle crashes, and nighttime crashes could not be identified and excluded. Studies based on other data sources will be needed to determine the effects of DRLs in reducing crashes and injuries.

If you have any further questions, please let me know.

Sincerely,



Allan Williams
Senior Vice President
Research