



**ADVOCATES**  
FOR HIGHWAY  
AND AUTO SAFETY

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Docket No NHTSA 98-4124, Notice 01  
U.S. Department of Transportation  
Docket Management, Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590

**Daytime Running Lamps, Notice of Proposed Rulemaking**  
**63 FR 42348 et sea., August 7, 1998**

Advocates for Highway and Auto Safety (Advocates) has reviewed the National Highway Traffic Safety Administration's (NHTSA) proposed amendment of the current maximum illumination levels for Daytime Running Lamps (DRLs) in Federal Motor Vehicle Safety Standard No. 108. The proposed changes would reduce maximum DRL candela levels in order to alleviate problems and complaints about glare from drivers of other vehicles. We also agree that the agency should index maximum permitted candela levels to higher operating voltages delivered from vehicle storage batteries.

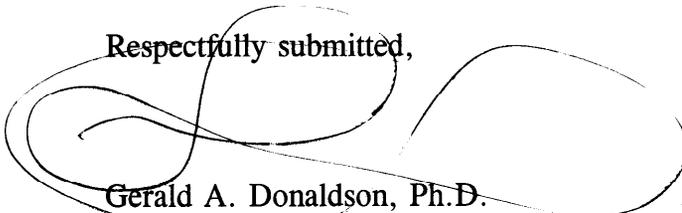
Advocates commends NHTSA for its candid response to concerns about the glare production from current upper beam headlamps, in particular, generating candela levels above 7,000 cd at DC currents equal to or greater than 14 volts. We fully support the three phase reduction in DRL beam intensity proposed by the agency, including the interim DRL candela reduction to 3,000 cd for upper beams at any point in their beams and the final reduction to 1500 cd at 12.8 volts. However, we believe that the agency needs to establish an upper limit on working voltage for determining compliance because many DRLs measured at 1500 cd with 12.8 volts of DC input will exceed 2,000 cd at higher voltages, especially at or above 14 volts. Current regulators usually send alternator charging currents of about 14.4 volts to lead acid



batteries and a number of passenger vehicles now have electrical systems, including lamps, operating at 14 volts or even slightly higher in some cases. NHTSA should ensure that actual intensity levels of DRLs do not significantly exceed 2,000 cd.<sup>1</sup>

Finally, Advocates fully supports NHTSA's decision to enhance the quality of highway operations through this proposal even though it departs from harmonization with current Canadian standards for DRLs. We are convinced that the agency is acting in a way that best serves the public interest of U. S. vehicle operators and this judgment of public need must always serve as the measure for agency policy departures from nominal international harmonization efforts.

Respectfully submitted,



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Senior Research Director

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<sup>1</sup>In this regard, NHTSA asserts at the start of the preamble of the instant proposed rule that Advocates was only one of two persons supporting the agency original proposal in 1991 for a maximum 2,600 cd limit on DRL intensity. 63 FR 42348, 42349. Although it is true that Advocates did not oppose 2,600 cd, we in fact argued that the agency should adopt an even lower maximum illumination level of 2,000 cd. See our comments to NHTSA Docket No. 87-6, Notice 04, October 10, 1991. The practical effect of NHTSA's current proposal will be to limit DRLs to about 2,000 cd.