

NHTSA  
DOCUMENT MANAGEMENT

3 DEPARTMENT OF TRANSPORTATION

SUBJECT: DOCKET 98-4124, NOTICE 1

98 AUG 31 PM 2:51

I read with interest your proposal regarding daytime running lights in the August 12 issue of Auto Week. As a retired Engineer I have questioned this Issue on several Counts.

First , I sincerely doubt that in the long term it serves a useful purpose . It is my understanding that the utilization of running lights is proposed to increase vehicle visibility, therefore resulting in accident reduction . In the short term, visibility would increase , but only until all vehicles exhibit running lights, then only those units without them would be noticed. When everything is the same no one takes notice. When high level brake lights were mandated, new vehicles were more noticeable from the rear. Now that the vast majority of cars and light trucks have highlites, I cannot remember if or when I took notice of units in front of me during daily driving. It reminds me of when our Teen age son started dressing in what we considered weird clothing . His reason was he wanted to be an individual. Unfortunately , when with a group of his peers, his individuality was lost. When all dressed or illuminated in the same manner, differences are lost .

Several years ago, several Major Trucking Companies publicized "Our lights are on for safety ." Are there any statistics to indicate that these lines had a better safety record? The same question should be asked regarding motorcycles mandated to operate with headlights. Have vision related accidents been significantly reduced?

I would hope that long term statistics from Canada and Sweden indicate significant reasons to cause your agency to set forth on a program which increase automotive cost, reduce reliability, and increase pollution .

Pollution is the second major concern that I have. I would hope that your group is aware that the EPA has or- would like to lower pollution levels particularity in several major cities. Since the power to operate headlamps or any running illumination is produced by the engine driven alternator fuel consumption is increased and pollution levels will rise. In cities where expressway parking lots are common, consider that 25 to 50 watts of additional power must be produced per car- by less than a 100 per-cent efficient engine to make the car in back of you more visible .

In the worst case, consider the number of millions of vehicles times the number of hours driven times the added fuel consumption .

A small amount of fuel per car, but an enormous quantity nation wide .

One has to question the trade off of pollution related deaths, versus the accident death r-ate reduction .

I would hope that you have thoroughly considered these items, for as often it has been said, "There is no such thing as a free lunch ."

Sincerely ,



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