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NHTSA-2003-15651-4



COMMUNICATIONS SECTION

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August 14, 2003

Ms. Jacqueline Glassman,
Chief Counsel, National Highway Traffic Safety Administration
Docket Management Facility,
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, D.C. 20590-001

**RE: NHTSA Docket No. NHTSA 03-15651; Comments on Interpretations
Regarding Replacement of Lamps, Reflective devices, and Associated
Equipment.**

Dear Jacqueline Glassman;

Truck-Lite Co. Inc. appreciates the opportunity to comment on the proposed drafts of letters of interpretation regarding replacement of lights, reflectors, etc. As a manufacturer and provider of a complete line of lighting products, we supply many these devices to the heavy duty trucking industry. We are especially appreciative of NHTSA's invitation for input, as parts of proposed response(s) may not be applicable for heavy duty lighting manufactures, such as Truck-Lite.

For the sake of clarity, our comments are in outline form and follow the general order of the published notice.

1. We certainly concur with the statement that any lighting function that might be removed in the replacement of a light must also be provided for in the new replacement. *However, in the case of heavy duty manufacturers, changes are often made on vehicles where the replacement of part of the lighting components might be in a different, but legally appropriate location.* For example, a new device might replace an older device with fewer (or more) functions. The *vehicle manufacturer or modifier* would then have the responsibility to be sure all of the required lighting functions were still being performed and that the lights were in acceptable mounting locations.

2. We would disagree with the statement that the *manufacturer of the lighting device would be responsible to certify that the equipment (vehicle) meets the standards requirement*. We believe that the vehicle manufacturer is the only party that has the information to police this, especially in the heavy duty vehicle industry. For example, we sell many kinds of lighting devices through catalog sales to hundreds of manufacturers whose equipment we have no way of knowing about. Besides that, many vehicle manufacturers buy heavy duty lighting products through third parties. We believe NHTSA was thinking primarily of automotive manufactures in this case, but some distinction should be made in the case of catalog type lighting manufacturers.
3. The draft states that *the manufacturer (lighting device manufacturer?) must design a lamp to ensure that the vehicle will continue to comply with Standard 108 when the replacement is installed*. Here again we believe that it is the *vehicle manufacturers or modifier's obligation to be sure he installs a replacement device with all the proper functions* for continued conformance of the vehicle. In the case of heavy duty vehicles, he may have a wide choice of catalog items from which to choose in order to do this.
4. In the discussion regarding the replacement of a lamp with a "missing" reflex reflector function, NHTSA said "It is immaterial that the manufacturer of the replacement equipment would provide a reflex reflector in another lamp. Here again the answer by NHTSA seem appropriate for passenger cars which normally require a specially designed lamp to fit the particular vehicle. In the case of heavy duty vehicles such as trucks and trailers, the use of a separate reflector or even an additional light in order to provide all the required photometric functions is not so unusual. *The fact that the vehicle continues to provide all the required lighting functions in their proper locations would seem to be the important point*. For such heavy duty applications it is fairly easy for enforcement people to note that all the required functions are properly accounted for. (We would be quick to agree that in the case of an automotive style light, this might not be so easy.) As a side note, NHTSA denied a petition a few years ago to require the legal functions code be marked on the lenses so people could know what functions are included in a lighting device...
5. The question was asked; can a lamp manufacturer design a lamp with different wattage bulbs? NHTSA said no, but we fail to see the rational for that. The use of a different bulb *which still passes all the legal requirements* should not create a problem unless it leads to confusion in substitution of bulbs which result heat or photometric problems. In fact, the industry made running changes a few years ago from the 1157 bulb mentioned to a 2057 because it generally resulted in improved photometrics and slightly lower power consumption. We would certainly agree that the light manufacturer would always be obligated to manufacture a light that meets the 108 requirements they are advertising when they are properly used.

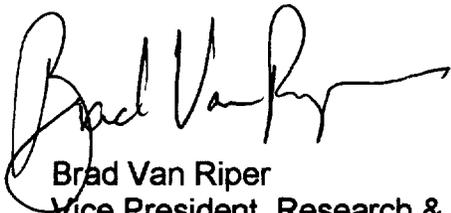
6. The same rationale can be applied to the redesign of a new lamp with a clear lens and a colored light source, provided that the device meets all the requirements. We are aware that certain manufacturers have made replacement lights for some custom applications which are not legal, but this should not be a cause to reject lighting changes *which meet all the requirements* and may offer improved performance as well. A good example would be the replacement of front turn and parking lamps on large trucks with sealed LED versions using clear lenses and long-life yellow light LEDs. Changes such as this offer lower wattage operation and longer life, plus other advantages.
7. NHTSA stated in more that one place that the lighting manufacturer is responsible to insure that the vehicle will continue to comply with 108 lighting requirements when replacements are offered. We would agree that the lighting manufacturer is responsible to be sure his product meets the 108 requirement for all the functions he advertises (when properly mounted), but we do not think he should be held responsible for the misapplication of the product by the equipment manufacturer or modifier. A reputable lighting manufacturer would always investigate the vehicle application *if he is requested to do so*, but the fact is, most manufacturers who offer catalog lighting products are not asked to do this and are generally unaware of all the applications that are being made by the vehicle manufacturers or modifiers.
8. The question was asked if a replacement light could be changed from incandescent to LED. We do not see why the answer to this question should be "no", provided the light meets or exceeds all the requirements. A good example is in the heavy duty and trailer industries where the "standard" stop, turn and tail incandescent light can be "replaced" by an equivalent LED light that looks similar and fits properly, but offers a multitude of performance advantages.
9. NHTSA noted that *each* vehicle is certified to Standard 108 using a *particular light source* and a *particular lamp*. We believe that the specifications for heavy duty vehicles often leave these requirements "open" for any lamp with the proper functions which can be properly mounted to meet the 108 requirements. Several manufacturers of heavy duty or trailer lighting might be able to supply slightly different versions of lights that would be legal when properly installed on the vehicle. The loss of this "option" will result in *decreased market competition* and most likely in *higher prices* for the same lighting performance. NHTSA should include these considerations in their final interpretation.

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10. NHTSA made the assumption that "the use of a different light source or wattage might adversely affect the vehicles overall lighting and electrical systems and possibly cause overloads and the risk of fire". We would agree that this is a possibility, but in our experience, as a reputable lighting manufacturer, we find that the opposite has often been true. For example, the replacement of an incandescent light with an LED light on trailers has improved conspicuity, resulted in lower wattage (heat), longer life and less amperage draw on wiring systems that are sometimes overloaded.

Thank you again for the opportunity to provide our input on this matter. Please feel free to contact us if we may be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Van Riper", with a long horizontal flourish extending to the right.

Brad Van Riper
Vice President, Research & Development
Truck-Lite Co., Inc.

cc: Brian Kupchella, Al Bragg, and Andrea Brandow