



Department of Transportation
National Highway Traffic Safety
Administration
Docket Management
Room PL-401
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2003-08-26

NHTSA Docket-2003-15651 - Replacement Part Comment -

Dear Ladies and Gentlemen,

Hella K.G., Hueck & Co. hereinafter referred to as Hella, would like to offer the following in response to the invitation for comments in respect of the Docket. Hella is a global supplier of automotive headlamps, signaling lamps and electronic components with its head office in Lippstadt, Germany. It is one of the pioneers of automotive lighting in Germany and in the world. Hella has been committed to supplying safe, high quality automotive components for over a 100 years.

In this submission, Hella would like to offer its extensive technical experience, particularly from Hella's cooperation in all relevant national and international expert groups on lighting, as there are SAE, UN-ECE WP29, ECE-GRE and GTB. Hella believes that the European experience could be a fruitful source of guidance for NHTSA.

Generally Hella supports NHTSA's approach for more highway safety which may be impaired by some lamp designs of certain manufacturers. In order to identify the major key issues we would like to suggest to have a more clear definition of "replacement parts". Under this docket both is covered, the original replacement equipment for repair purposes (OEM/S) and –as we would like to call it- aftermarket and/or conversion kits.

Replacement Lamps

As far as replacement parts are concerned we fully agree with NHTSA's view on this. But, we also would like to see some more design flexibility in FMVSS No. 108 in terms of improvements during the production period of an original replacement lamp for a certain vehicle type. These improvements may result in better lighting performance or for example, some internal features of a lamp have been changed for optical or other engineering reasons this should be also legal under "108" as long as the appearance did not change visually and –of course- the required specifications are still met. In cases where lamps are performing as a matched pair and a re-designed replacement part may become obvious, the replacement has to be done on both sides of the vehicle to obtain a uniform signal appearance. The relevant replacement instructions have to be provided by the lamp and the vehicle manufacturer, as well.



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Empfänger DOT, NHTSA, Docket Management, Room PL-401, 400 Seventh Street S.W., Washington

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Under these provisions a change of bulbs does not cause any harm to safety, as long as the specific vehicle performance has not changed, as there are for instance the failure control of direction indicator flashers and any vehicle based light source monitoring systems.

Aftermarket Lamps

Hella believes that especially lamps according to the above mentioned definition are in the focus of NHTSA's concerns. These lamps are usually offered by aftermarket companies with no or minor experience in producing original equipment under the guidance of a vehicle manufacturer. But, it may also happen that even some vehicle manufacturers do provide the opportunity to their clients to have a more customized vehicle with a higher personal identification for the owner.

The scenery in the area of aftermarket lamps or conversion kits is less controlled by NHTSA's enforcement compared to OEM. This results in poor designed and –due to this– poor performing lamps. At the same time, some aftermarket designs are intended by its manufacturers for improved nighttime driving performance. Maybe that at the time of the design of vehicle this technology was not available or not intended by the vehicle manufacturer for a certain class of vehicle for cost or other marketing reasons.

Generally, a lamp which is designed to conform with the relevant requirements of FMVSS No. 108 should be regarded as legal. We see NHTSA's concerns -for example- in having rear combination lamps where not the entire lighting equipment is implemented as compared to the OEM version (i.e. no reflex reflector or side marker). The lighting performance concerns (i.e. colored bulb/clear lens in direct sunlight) could be covered carefully in the relevant expert groups like the SAE Lighting Committee and in UNECE's lighting expert group GRE. A joint working group between SAE and GRE could be installed through the lighting engineering group of GTB, founded 1952.

Since, the control instruments for the vehicle in service are governed under State Law, we will support NHTSA in its activities to avoid any negative highway safety implications due to products of manufacturers with a lack of sensitivity for highway safety needs, especially during nighttime driving conditions.

Hella kindly asks the Agency to reconsider its interpretations, also with respect to the business impacts for some reputable manufacturers.

Please, do not hesitate to contact me under the above mentioned phone, fax or email connections.

Hella KG Hueck & Co.
Department GL –TM

i. A.

Olaf Schmidt