

255925



DOUGLAS DYNAMICS, L.L.C.

DEPARTMENT OF TRANSPORTATION
DOT/HS

MAIL: P.O. Box 245038, Milwaukee WI 53224-9538
SHIP: 7777 N. 73rd Street, Milwaukee WI 53223
PHONE: 414-354-2310 FAX: 414-354-8448

7000 DT - L A 10-18

October 1, 2003

U. S. Department of Transportation
National Highway Traffic Safety Administration
Docket Management Room
PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590

NHTSA - 03 - 15651 - 17

RE:

Dear Sirs:

Douglas Dynamics, L.L.C. is a manufacturer of snow and ice control products sold in thirty-eight states. The products are sold under the trademarks Fisher® and Western® brands. Our products are primarily sold to commercial and municipal users. Our businesses have existed each for over fifty years.

Snowplow auxiliary headlamps are replacement lamp assemblies mounted as part of the installation by final stage manufacturer or alterer. These replacement original lamps meet the requirement of FMVSS108 and are certifiable. In most cases our bulbs are not the same as original vehicle headlamp or part / turn bulbs. Our standard replacement lamp is a common assembly reducing costs for installation and equipment. Further, a standard set of bulbs makes service parts more readily available within our distribution system. Douglas agrees that a lamp such as described in the example and in the referenced letter should meet all the same functions as the OEM supplies and be certified lamps. We do not agree however that the use of different components would cause a vehicle to be out of compliance with FMVSS 108.

OEM vehicle integral headlamps and part/turn assemblies are not mountable to a snowplow assembly reliably and safely. In conclusion, Douglas Dynamics agrees with a consistent approach of replacement lamp assemblies. Lamps designed to replace OEM lamps should contain the function of the original lamp they are replacing. All lamps should be compliant to FMVSS108. We feel these lamps can have different components such as light sources, lenses, bulbs and wiring. We feel our current offering as auxiliary lamps provides equal safety at lower costs without compromising compliance.

Sincerely,

Gary Watson