



Richard P. Bowling • President

Truck Trailer Manufacturers Association • 1020 Princess Street • Alexandria, Virginia 22314-2247 • (703) 549-3010 • Fax (703) 549-3014

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

RE: Docket Number NHTSA 03-15651

Truck Trailer Manufacturers Association (TTMA) is an international trade association comprised of truck trailer and tank trailer manufacturers, along with cargo container, cargo tanks for trucks and container chassis manufacturers. The associate membership represents material and component suppliers to the industry. TTMA is pleased to have this opportunity to offer comments on the *Notice of draft interpretations*.

As you know and understand when a vehicle manufacturer certifies a new vehicle and applies the certification label, they are stating that all of the regulations at the time of manufacture have been met including section 571.108.

TTMA agrees with your statement that the replacement items must conform to the standard in the same manner as the original equipment for which the vehicle manufacturer certified compliance. Of course, replacement equipment must also be certified as having been designed to conform to all of Standard No. 108's requirements that applied to the original equipment; e.g., photometric performance, minimum effective projected luminous lens area, lens material weatherability performance, etc.

TTMA, however, cannot agree with your statement:

“Each vehicle is certified to Standard No. 108 using a particular light source for a particular lamp. The lamp's ability to meet the standard's requirements with that light source is an inherent part of the certification”. (NHTSA Draft 2)

With advancements in technologies and materials, there are now more efficient lighting devices that meet and/or exceed the originally installed lamp. In the trailer industry most lighting is not specific to make and model as in the auto industry. Therefore, requiring all vehicles to have “identical” replacements lamps may prevent end users from installing equivalent safer, more efficient lighting like LEDs. The use of certain lamps such as

LEDs could provide better photometric performance and draw less amperage, thus lessening the chance of over loaded circuits and risk of fire. Further in support of allowance of the substitution of “equivalent” devices you state in NHTSA Draft 2 “Under S5.8.1, whenever a manufacturer designs a lamp to replace a lamp on a vehicle to which the standard applies, the manufacturer must design that lamp to ensure that the vehicle will continue to comply with Standard No. 108 when the replacement lamp is installed,” Thus, the manufacturer of the replacement lamp should be in a position to certify the applicability of replacement lamps.

In summary TTMA believes that any replacement lighting equipment should comply with the corresponding Federal Regulations, but fails to see how the end user should be restricted from buying improved lamps that still meet Standard 108. Perhaps the interpretation letter issued from NHTSA should exclude vehicles with a GAWR of more than 10,000 pounds, or with an overall width of 80 inches or wider, and most certainly should put responsibility on the owner/operator of the equipment to insure that any replacement lighting complies with the Federal Regulations.

With Kind Regards;

Jeff Sims

Jeff Sims
TTMA Engineering Manager