

December 23, 2021

BY EMAIL

Meera Joshi, Deputy Administrator
Federal Motor Carrier Safety Administration
meera.joshi@dot.gov

Re: Flat Surface Spatially Anisotropic Radiation Devices

Dear Meera Joshi,

The Soft Lights Petition to ban blinding LED radiation devices is approaching 30,000 signatures. Here are a few of the most recent comments.¹

“It's so bad that I get migraines any time I go out at night. It's just not reasonable to expect everyone with sensitive eyes to never drive after dark or in stormy weather. These lights are so bright and disorienting that it can lead to premature vision loss!”

“These lights are harmful and are going to cause many accidents!”

“It is so distracting and dangerous while driving and having these kinds of headlights blinding you! I have feared for my safety when I could barely even see the guide line to the right of my truck”

The National Highway Transportation Safety Administration has never approved spatially anisotropic radiation from a flat surface for use as a vehicle headlight. For aftermarket headlights that are often used on commercial trucks, NHTSA has released a letter confirming that NHTSA has never approved any aftermarket LED headlights² Therefore, all aftermarket LED headlights on the road today are illegal and the FMCSA and the state DOTs should be taking action to remove these dangerous devices from the roadways.

Figure 1 is a photo taken in October, 2021 of a vehicle with LED headlights. This photo is representative of the glare and danger presented by LED headlights. While both OEM and aftermarket LED headlights are illegal, the focus of this letter is on aftermarket LED headlights that are most common in commercial trucks.

¹ <https://www.change.org/p/u-s-dot-ban-blinding-headlights-and-save-lives>

² <http://www.softlights.org/wp-content/uploads/2021/12/Leroy-Angeles.pdf>



Figure 1 - LED Headlights

Figure 2 shows an older model truck with aftermarket LED replacement headlights. We know that the headlights are LED because we can see the diodes in the photo.

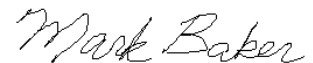


Figure 2 - Illegal Aftermarket LED Headlights

According to the FMCSA website, the FMCSA is *"the lead government agency responsible for regulating and providing safety oversight of commercial motor vehicles (CMVs), FMCSA's mission is to reduce crashes, injuries, and fatalities involving large trucks and buses."* Given the FMCSA's mission and directive from Congress, it is imperative that the FMCSA notify and engage with all 50 state Departments of Transportation to begin the process of inspecting commercial trucks for dangerous and illegal LED headlights so that they can be removed from our roadways to protect both truck drivers and the public from injury and death.

Because of the existence of commercial inspection stations across the USA, and because the visual inspection for LED headlights is simple, the system is already in place for the state DOTs to add LED headlight inspections to their checklist and for the FMCSA to modify the inspection database to include inspection results for LED headlights. We request that the FMCSA promptly implement such a system.

Sincerely,

A handwritten signature in black ink that reads "Mark Baker". The signature is written in a cursive, slightly slanted style.

Mark Baker
President

Soft Lights Foundation
mbaker@softlights.org

9450 SW Gemini Drive PMB 44671
Beaverton, OR 97008