



January 24, 2022

BY EMAIL

Alberto Schiavon, President
Elephant Insurance
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Re: The LED Fraud

Dear Alberto Schiavon,

Insurance companies rely on the Insurance Institute for Highway Safety to perform and analyze research to protect their business interests. The IIHS has failed to alert their member groups that LED headlights are dangerous and illegal, and that there is a liability issue that comes from insuring vehicles with illegal headlights.

- 1) NHTSA FMVSS-108 is only applicable to headlights with spatially uniform sources of light plus lenses. A flat-surface chip that produces a spatially anisotropic light beam, rather than uniform light, cannot comply with FMVSS-108. The result is that all LED headlights are illegal in the USA.
- 2) The automakers are fraudulently self-certifying LED headlights as compliant with FMVSS-108. We believe that this is occurring because the engineers are failing to use precision measurements at the picometer or femtometer scale when measuring luminous intensity. The auto industry likely using software that is not calibrated to plot and calculate data at the femtometer scale. The result is that the testing engineers are failing to recognize that the luminous intensity far exceeds maximums set in FMVSS-108.
- 3) LED headlights are not civil and are leading to a breakdown of society because they are causing eye damage, road rage, agitation, distraction, vehicle accidents, neurological disruption, and drivers quitting their jobs.
- 4) The petition to ban LED headlights has tens of thousands of signatures:
<https://www.change.org/p/u-s-dot-ban-blinding-headlights-and-save-lives>
- 5) The insurance industry is facing a major liability situation due to their insured's use of LED headlights which are known to be a dangerous product.

We are including our report titled, The LED Fraud, which details the issues of LEDs that the IIHS, NHTSA, NTSB and others are ignoring. By ignoring the fact that LEDs are toxic, hazardous, dangerous, discriminatory, and unregulated, IIHS has created liabilities for themselves and their members.

Sincerely,

Mark Baker

Mark Baker

President

Soft Lights Foundation

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