

January 7, 2022

**BY EMAIL**

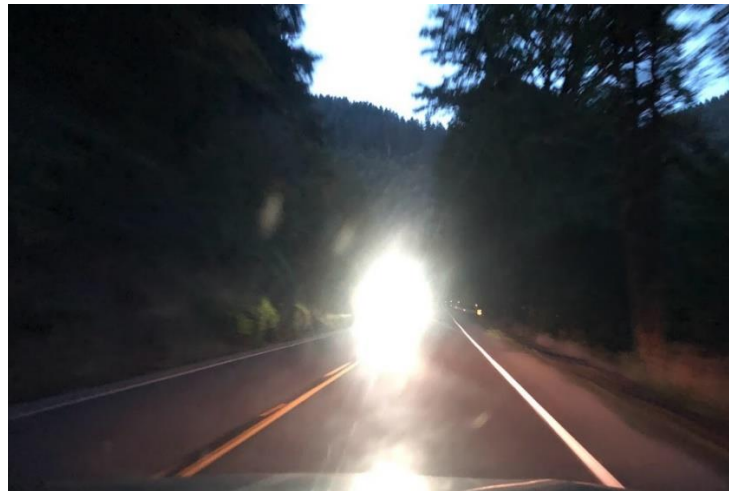
Bob Van Brocklin, Commission Chair  
Oregon Transportation Commission  
OTCAdmin@odot.state.or.us

**Re: Dangerous and Illegal LED Headlights**

Dear Bob Van Brocklin,

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 headlights<sup>1</sup> Therefore, all aftermarket LED headlights on the road today are illegal and the Illinois Department of Transportation 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.



*Figure 1 - LED Headlights*

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<sup>1</sup> <http://www.softlights.org/wp-content/uploads/2021/12/Leroy-Angeles.pdf>

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*

Because of the existence of commercial truck inspection stations, and because the visual inspection for LED headlights is simple, the system is already in place for the Oregon Department of Transportation to add LED headlight inspections to their checklist. We request that the Oregon Department of Transportation implement such a system.

Sincerely,

*Mark Baker*

Mark Baker  
President

Soft Lights Foundation  
[mbaker@softlights.org](mailto:mbaker@softlights.org)

9450 SW Gemini Drive PMB 44671  
Beaverton, OR 97008