



February 18, 2022

**BY EMAIL**

Roger Millar, Secretary of Transportation  
Washington Department of Transportation  
millarr@wsdot.wa.gov

**Re: Illegal and Dangerous Aftermarket LED Headlights**

Dear Roger Millar,

The purpose of this letter is to formally notify the Washington Department of Transportation that aftermarket LED headlights have never been approved for use by the National Highway Transportation Safety Administration and that use of aftermarket LED headlights is illegal. Because LED headlights are illegal, and because they are toxic, hazardous, and discriminatory, WDOT must enforce the law and take action to remove LED headlights from use on Washington's roads. For example, WDOT must ensure that headlights are visually inspected during commercial truck inspections and issue a citation for commercial trucks with aftermarket LED headlights.

Here is a video showing the glare from LED headlights: <https://youtu.be/sQHpiKG7UhA>



*Figure 1 - Glare from LED Headlights*

Figure 2 shows a commercial truck with LED headlights. The use of LED headlights is immediately obvious because the diodes are clearly visible. Therefore, an inspection will only take 30 seconds to identify the use of the illegal LED aftermarket headlights.



*Figure 2 - LED Headlights on Commercial Truck*

The National Highway Transportation Safety Administration issued a letter on August 20, 2020, affirming that no aftermarket LED headlights have ever been approved for use.<sup>1</sup>

The Washington Department of Transportation has a duty to protect the residents and guests of Washington from illegal and dangerous LED headlights. For commercial trucking, WDOT should add an LED headlight inspection step to the standard inspection process. For private vehicles, WDOT is advised to ensure that vehicle headlights are inspected every two years at an inspection station. Failure of WDOT to enforce the existing law puts lives at risk and creates a liability for WDOT.

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<sup>1</sup> <http://www.softlights.org/wp-content/uploads/2022/01/Leroy-Angeles.pdf>

Sincerely,

*Mark Baker*

Mark Baker

President

Soft Lights Foundation

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