



Mark Baker <mbaker@softlights.org>

Iowa DOT response to Soft Lights Foundation: emails dated February 7 and February 18

Mark Baker <mbaker@softlights.org>

Thu, Mar 10, 2022 at 11:12 AM

Draft To: "Huser, Kelli" <Kelli.Huser@iowadot.us>

Cc: "Marler, Scott" <Scott.Marler@iowadot.us>, "Commissioners, DOT [DOT]" <DOT.Commissioners@iowadot.us>, "Fehrman, Kathy [DOT]" <Kathy.Fehrman@dot.iowa.gov>, "Enforcement, Vehicle [DOT]" <Vehicle.Enforce@iowadot.us>, "Johnson, Robert" <Robert.Johnson@iowadot.us>, "Mcguire, Shirley [DOT Contact]" <Shirley.Mcguire@dot.gov>, "luke.loy@dot.gov" <luke.loy@dot.gov>, "mackenzie.praytor@dot.gov" <mackenzie.praytor@dot.gov>, "Enforcement, Investigation [DOT]" <Investigation.Enforcement@iowadot.us>, "Gillett, Melissa" <Melissa.Gillett@iowadot.us>, "Ridout, Ryan" <Ryan.Ridout@iowadot.us>, "Jerman, Troy" <Troy.Jerman@iowadot.us>, "Lorenzen, David" <David.Lorenzen@iowadot.us>, "Bruun, Tom" <Tom.Bruun@iowadot.us>, "Maahs, Jason" <Jason.Maahs@iowadot.us>, "Dugger, Jeremy (FMCSA)" <jeremy.dugger@dot.gov>

On Thu, Mar 10, 2022 at 9:38 AM Huser, Kelli <Kelli.Huser@iowadot.us> wrote:

Mr. Baker,

We received your email dated February 7 and your subsequent email dated February 18 and thank you for your patience as we reached out to our federal partners on this issue.

We have spoken to NHTSA and have confirmed that Iowa is correctly recognizing a distinction between LED headlights and LED headlamps. Complaint LED headlamp systems are permitted under federal law. LED replacement bulbs, on the other hand, are not permitted under federal law. For the issue of LED replaceable bulbs, we would share with you that we are working with NHTSA on educational materials for law enforcement to help distinguish between the permitted integral headlamp systems that use LED technology from replaceable bulb headlamp systems that use aftermarket LED replaceable bulbs (ex. H11/H8/H9 Halogen to LED Conversion Kits) that do not meet Federal Standards. We believe this approach will bolster enforcement in line with federal law.

You asked for a status update in your February 7 email. As we shared with you previously, Iowa DOT conducts tens of thousands of commercial vehicle inspections per year under its Commercial Vehicle Safety Plan (CVSP). For federal fiscal year 2022, the CVSP is to perform over 42,000 inspections on commercial motor vehicles. When light sources are identified during those inspections that are not permitted under federal law, our officers take enforcement action as appropriate. We believe that our continued discussions with NHTSA on training materials will ensure all law enforcement has the tools necessary to enforce federal law while recognizing the legality of LED headlamp systems.

Thank you for your time.



Kelli Huser


COMPLIANCE OFFICER

MOTOR VEHICLE DIVISION

3/10/22, 11:12 AM

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