

March 11, 2022

BY EMAIL

Chad Sheppick, Director
Motor Carrier Division, Utah Department of Transportation
csheppick@utah.gov

Re: Unapproved LED Headlights

Dear Chad Sheppick,

The blinding glare from LED headlights is exceedingly dangerous.



Figure 1 - LED Headlights

There are now two types of electromagnetic light sources in this world: point sources and surface sources.

Point Source – Examples: the sun, a candle, incandescent, tungsten/halogen, High-Pressure Sodium. The light from a point source is uniform. Government standards are written for point sources of light. FMVSS-108 applies to point sources.

Surface Source - Examples: LED, laser. The light from a surface source is non-uniform. While there are government regulations for lasers, there are no regulations for LEDs. NHTSA has no regulations for surface source LEDs as vehicle headlights and thus all LED headlights are non-compliant and illegal.

The Soft Lights Foundation has received confirmation from NHTSA by way of the Iowa Department of Transportation that aftermarket LED replacement bulbs are unauthorized and thus illegal. The letter we received is posted on our website here: <http://www.softlights.org/wp-content/uploads/2022/03/iowa-DOT-Response-March-10-2022.pdf>

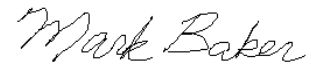
The two NHTSA staff who provided this information to Iowa DOT are:

Leroy Angeles, Safety Compliance Engineer: leroy.angeles@dot.gov
Claudia Covell, Chief of the Equipment Division: Claudia.covell@dot.gov

While we have notified NHTSA about the differences between point source and surface source light, we have not yet received a formal notice from NHTSA that OEM or aftermarket headlights are illegal. However, we are working with Congress and the FMCSA to solve this issue.

Many commercial trucks were built before LED headlight systems were invented, so a Utah DOT inspection would easily identify illegal aftermarket LED headlights based on the year of the commercial vehicle. Our request is that the Utah DOT Motor Carrier Division collaborate with the FMCSA to develop an inspection process for LED headlights on commercial trucks. We also request an aggressive campaign by law enforcement to eliminate aftermarket LED headlights from commercial vehicles.

Sincerely,



Mark Baker
President

Soft Lights Foundation
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