

Comment from Jay Seastrunk

I am writing to support the rule change to support the certification of adaptive driving beam head-lighting systems. I first became aware of these systems six or more years ago through this video posted regarding a BMW system (generally the EU cars all share similar systems) (link to video: <https://www.youtube.com/watch?v=-dvPZ3H1Vm4>) - I note that this was six years ago - and here we are the United States with no ability to have similar systems on our cars six years after they were debuted in the EU. Why must we be so far behind the curve when it comes to automobile lighting and safety?

To that end I would like to propose that the NHTSA go further and move toward adopting European headlight standards so that systems certified in the EU can also be certified in the US at the same time - so there is a world standard. Or if they can not bring themselves to do this to make the evaluation of new systems less draconian to the auto manufacturer so that they would be more willing to apply to implement the same technology used in the EU in the US - and consider deleting outdated / antiquated rules which put road blocks in front of new technology.

Additionally I would like to point out on any given drive that I take in the evening today, I encounter many vehicles that have installed after market headlights or bulbs (likely not certified by the US DOT for road use) typically pickup trucks or jeeps which have been customized to some degree which put out glare, dazzle, and blind oncoming drivers (this is happening now) including myself. I can only suspect that these vehicle owners are frustrated by the poor quality of headlight output from their standard lights and want better head lighting so they buy what is available. Unfortunately what is available are poorly engineered, off road use only, lamps which provide plenty of light, but do little to consider the drivers of oncoming cars as they blind, dazzle, and fill their windscreens with glare.

I believe the NHTSA should take into consideration the "back door" currently practiced of the widespread use of non certified for road use headlamp when making new rules or adjusting current rules - and balance easing implementation of new lighting technologies proven in the EU with the rampant use of non complaint headlights which are far worse in that they are not engineered at all to address oncoming traffic.

This same logic of creating a more efficient path to implement EU technology in the US should go beyond lighting, and apply to almost all functional systems introduced, including but not limited to safety systems and lighting systems. I long for the day when I can buy a car manufactured by an EU manufacturer that has the same safety and lighting systems for the US versions as they do for the EU versions. Why not?

While on the subject of automobile lighting, I am not clear if this is a result of NHTSA rules or a marketing fad, but it seems US cars cycle through periods of amber turn signals, and red turn signals - (currently we are in a red phase - not unlike the late 1970's) when it seems to me amber turn signals are much safer and proven to be so.

Another pet peeve is rear fog lights - some us cars have them, some manufacturers feel compelled to delete them - though there are no driving education courses that mention when to use rear fog lights, none the less some cars come equipped with them - I believe they are highly beneficial in fog, or in rain on asphalt roads treated with coatings that cause excessive road spray kicked up from tires as a mist particle (almost worse than fog for visibility)