

MORE FROM THE 1998 FEDERAL REGISTER, DOCKET # 4124...

(Link to #4124 - http://dmses.dot.gov/docimages/pdf29/41090_web.pdf)

Bottom Line: "NHTSA explained that: The two chief considerations in this regard are that the lamps not create excessive glare, and that their use does not mask the ability of the front turn signal to send its message." (page 42348, paragraph 14)

"...the agency (NHTSA) believes that practical and low cost solutions can be achieved that permit manufacturers to modify their DRL modules, and use more turn signal lamps as DRLs." (page 42352, paragraph 6)

"However, NHTSA does not want to discourage the installation of DRLs. Research indicates that DRLs do improve vehicle conspicuity..." (page 42356, paragraph 2)

"In response to these [public] comments, NHTSA sought to find a middle ground that would achieve the agency's goal of preventing excessive glare and masking of turn signals, and accommodating the commentators desire for harmonization and the chance to use the simplest DRL system." (page 42349, paragraph 5)

"However the glare limits in this proposed amendment may well move manufacturers to choose turn lamps or dedicated DRL lamps as the preferred DRL option." (page 42357, paragraph 4)

"Additionally, NHTSA notes that DRLs that use turn signal lamps, lamps intentionally designed to provide wide angle conspicuity, would address Canada's concern for assuring the maintenance of DRL peripheral detection benefits." (page 42358, paragraph 3)

Conclusion: *Seems like even NHTSA is on record as wanting to encourage motor vehicle manufacturers to use more Turn Signal lamps as DRLs. AllQuality believes the DRL-2005 is the simplest system mentioned above, and the long term solution to DRLs in North America.

*Disclaimer: By way of federal law, the US Government can not and will not endorse any individual product or company. This is only NHTSA's acknowledgement nearly 8 years ago of an emerging technology and its potential benefits to the automotive world and mankind.

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LIGHTS 'ON' IN THE DAYTIME MAKE SOME PEOPLE ASK:

"SO JUST WHAT IS THE LOGIC BEHIND DAYTIME RUNNING LIGHTS?"

The logic behind DRLs is that keeping lights 'on' during the day makes a vehicle that much more conspicuous. Studies show that the earlier you detect another vehicle on the roadway and can estimate its distance and speed, the less likely you will be involved in a crash with that vehicle. Subsequently, the presence of DRLs simply improves human detection.

AMBER[®] DRLs not only improve human detection over white light types or headlight operation, but they also counteract a "latitude effect," by which white light's effectiveness diminishes the closer one is with respect to the Earth's equator.



2004 Honda Civic[®] with the AllQuality PlanetSafe DRL-2005 Controller acting on the AMBER[®] Turn Signal Lamps built into Custom Aftermarket Projector Headlight Assemblies

IN THE BOOK "EVER WONDER WHY?" BY DOUGLAS B. SMITH (1991, Random House), THE FOLLOWING QUESTION IS POSED:

"EVER WONDER WHY MOST TRAFFIC SIGNALS AND MARKERS ARE YELLOW?"

Answer: "Yellow is the most visible of all the colors in the spectrum. It can be seen from the farthest distance and is conspicuous in all lighting conditions. This makes it a natural choice for traffic signals, which must be seen from great distances." (pg. 52)

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WHAT THE EXPERTS & OTHERS ARE SAYING ABOUT DAYTIME RUNNING LIGHTS (DRLs) & EFFECTIVENESS

BELOW ARE ACTUAL QUOTES:

“A key point is that most [DRL°] effectiveness studies are based on a large proportion of vehicles with low beam headlight DRLs, but photometric analysis suggests that these are only marginally effective on all but very dull days. Recent U.S. research... has shown that bright turn signal [AMBER°] DRLs are more effective than headlight DRLs...”

Michael Paine

Australia's Leading DRL Expert

(<http://www4.tpg.com.au/users/mpaine/drl.html>; paragraph 4 & elsewhere)

“Or in short, forty years on from the [1961°] Texas ‘Light up and Live’ [low beam headlight°] campaign, to date there is still no satisfactory scientific evidence from the monitoring studies of motorcar daytime lights that have been conducted since then that [white headlight°] daytime lights have reduced accidents.”

Antonio Perlot

Federation of European Motorcyclists Associations

Stephen Prower

British Motorcyclists Federation

March 2003 Study

(http://dmses.dot.gov/docimages/pdf85/239101_web.pdf; page 16)

“From a lighting safety perspective, the use of [AMBER°] front turn signals as DRLs is desirable, because it:

- eliminates all possibility of turn-signal masking by other [headlight/white light°] DRLs,
- increases the angles at which the DRL can be seen (visible at 45 degrees) which should increase the benefit at intersections,
- virtually eliminates glare [with respect°] to other motorists,
- prevents incidents where drivers forget to turn on full headlights (with tail lamps) in inclement weather or at twilight because the headlamp DRLs provide so much light, and
- allows motorcycles (with headlights ‘on’) to keep a unique conspicuity signature.

Additionally, non-safety benefits are that turn signal [AMBER°] DRLs offer:

- a fuel economy benefit of up to 0.5 m.p.g. compared to headlamp DRLs (according to 1990 test data),
- lower cost of replacement bulbs (compared with replacement costs for headlamps or headlamp bulbs), and
- lower cost than reduced intensity lower beam headlamps, according to the 1995 Economic Evaluation of DRLs performed by Transport Canada.”

Federal Register / Vol. 63, No. 152

Docket NHTSA 98-4124; pg 42357, paragraph 2
(http://dmses.dot.gov/docimages/pdf29/41090_web.pdf)

STUDY: *Daytime Running Lamps (DRLs) for Pedestrian Protection* [SAE #203-01-2072]

Study Results: DRL Types - Reduction in Collision Rates:

Full Intensity Low Beam Headlights	3.23%
<u>AMBER° Turn Signal DRLs</u>	<u>12.40%</u>

Paul A Thompson

(http://www.sae.org/servlets/productDetail?PROD_TYP=PAPER&PROD_CD=2003-01-2072)

“The daytime AMBER° running lights are great and should be the only DRLs allowed. They are eye-friendly with no annoyances, irritations, distractions, rear view mirror adjustments, or hazards. Smart, sensible, effective, and most important, the safety you [the National Highway Traffic Safety Administration (NHTSA)°] are striving to achieve.”

Terry Quesnel

Comments to NHTSA Docket 98-4124
(http://dmses.dot.gov/docimages/pdf84/213299_web.pdf)

“When are you [DOT/NHTSA°] going to make all daytime running lights AMBER°. They actually stand out better in the daylight than white lights especially under certain conditions and this is all done without the glare associated with white lights... I have no problem with all cars and trucks having AMBER° daytime running lights...”

Anonymous: 2-20-05

Comments to NHTSA Docket 98-4124
(http://dmses.dot.gov/docimages/pdf91/326145_web.pdf)

“Daytime running lights - it is time for the DOT to establish a UNIFORM STANDARD. DRLs are now a random accessory, some use parking lights** (AMBER°, very nice)... I would like to see a DRL standard requiring AMBER° parking lights** only and on all vehicles.” [**these are actually 21 Watt Turn Signal lamps°]

James M. Ungerman

Comments to NHTSA Docket 98-4124
(http://dmses.dot.gov/docimages/pdf81/167669_web.pdf)

“The other alternative I’ve seen used is the AMBER° marker [Turn Signal°] lights as DRLs. This approach is used on Chevrolet Corvette® and Oldsmobile Intrigue®. The lights are visible, yet are not distracting.”

Brian Erne

Comments to NHTSA Docket 98-4124
(http://dmses.dot.gov/docimages/pdf75/145608_web.pdf)

“The only daytime running light that I find is acceptable is what is used on the new Corvettes®. They use an AMBER° parking light** in the bumper... which does not cause a glare problem.” [**these are Turn Signal lamps°]

Gordon Lavrick

Comments to NHTSA Docket 98-4124
(<http://dmses.dot.gov/docimages/p75/240051.doc>)

“I urge you (DOT/NHTSA) to... retrofit each US vehicle with a proper DRL system, consisting of: Turn signal based DRLs, or discrete (preferably 21W AMBER°) DRLs... and install a separate shutoff switch for drivers that KNOW when to turn their lights on/off.”

Edward F. Cooke

Comments to NHTSA Docket 98-4124
(http://dmses.dot.gov/docimages/pdf80/160908_web.pdf)

**Parking Lights (7 Watt bulbs) are not legal for use as DRLs in the U.S., as they are deemed by the DOT (the U.S. Department of Transportation) “too dim” in daylight hours to be effective.

°AMBER capitalized & [Brackets] added for emphasis / Front turn signals req'd Amber by law

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