Drivers Against Daytime Running Lights - UK

Helmut Panke BMW AG 80788 Chairman of the Board

Page 1 of 2

Munchen Germany Dear Mr. Panke, 15 October 2003

Daytime Running Lights (DRL)

From a 5 series loan car provided by my BMW dealer, it is disappointing to find that BMW are installing an "Automatic" DRL position to the light switch on your UK vehicles, particularly as BMW are a maker of motor cycles whose conspicuity is most affected by motor vehicle DRL.

Producing vehicles with full power low beam DRL (and particularly the glaring HID DRL on your new models), means every time a BMW driver traverses a speed hump or a pothole, he breaks the UK law (Highway code rule 94 *Law RVLR reg 27*) by causing dazzle and discomfort to other motorists as the self levelling mechanism cannot react fast enough.

Contrary to the efforts of lamp manufacturers and certain car companies (DRL were introduced by the Swedish when they changed from driving on the left to the right and have kept them up as a marketing gimmick), daytime fog and headlights are a danger to others and they cause unnecessary environmental pollution.

Please may I lodge with you a copy of the 95 page research document by Perlot and Prower 2003 (also available from www.dadrl.or.uk) which proves that previous research used to claim DRL have a benefit uses flawed data. I list an extract from the conclusion:

Review of the evidence for motorcycle and motorcar daytime lights

In conclusion, the formal evidence of the monitoring studies of the effect of both motorcycle and motorcar daytime lights fails to establish satisfactorily that daytime lights have had any overall effect to reduce accidents. The methods that the studies have employed are inherently flawed: the odds-ratio method is not specific to the effect of daytime lights, and the fleet study method is incapable of distinguishing between the immediate novelty effect of daytime lights, and their enduring true effect. The prima facie arguments in favour of motorcar daytime lights in turn fail to rescue the studies. On the positive side of the balance, the effect of daytime lights to reduce accidents is likely to be trivial. On the negative side there are important potential adverse side-effects.

The use of DRL by one group will eventually force other drivers to use DRL thus negating any claimed benefit, the consequence is that more vulnerable less conspicuous road users will be at more risk.

There is also growing evidence from the USA that DRL can cause eyesight damage which could lead to class action claims.

On the environmental front, since 1997 General Motors has forced most USA motorists to use daytime running lights. Generating electricity from a vehicle engine is extremely inefficient due to mechanical and engine heat losses. To run two 55 watt headlights and associated lamps takes 970 watts of fuel energy. It is calculated that DRL will cost the USA \$600 million dollars using 406 million US gallons of fuel p.a. creating 33 million tonnes of carbon di-oxide pollution p.a. (source http://www.howstuffworks.com search "daytime lights" or question 424).

Across the EU, probably the emissions would be similar to the USA. May I quantify the waste for the UK:

UK Daytime driving only	No. of vehicles	Litres of fuel p.a.	MWh	Costs	Tonnes of CO2 p.a.
Present DRL users	670,000	15.8 million	167,360	£11.8 million	41,840
Total UK vehicle parc	26 million	612,707 million	6,494,694	£495.5 million	1,623,673

The facts are not firm, it is hard to quantify how many boy racers encouraged by Ford and Volvo, blaze around with headlights AND fog lights on in good daylight so we are open to fine tuning of the data.

To put the potential waste in perspective this is more than the annual output of Oldbury on Severn nuclear power station - more than 2.4 TIMES all the power generated by green renewable sources last year in the UK!

As you may know the year on year decline in UK road accidents has stopped (please see www.safespeed.org.uk), in particular accidents to pedestrians, cyclists and motorcyclists are increasing. The City of London has reported a particularly sharp increase in accidents to these groups. Nationally, this is due to the government's misguided policy of persecuting rather than educating drivers and improving the road network.

We believe a contributory factor is the increase in DRL usage promoted by irresponsible manufacturers which affects the hazard perception abilities of other drivers.

The EU is concerned about the dangers of DRL to more vulnerable, less conspicuous road users and has commenced a new study but this is not due to report until late 2005.

In response to hundreds of vehement complaints about dazzle and glare in the USA, the NHTSA is being forced to issue a directive requiring a much reduced DRL intensity (please see http://dms.dot.gov/search at the docket number window, type in "4124").

We are writing to all manufacturers to draw the safety and environmental dangers to their attention, I hope that you and your board members will consider carefully the implications of DRL.

Formally, we must advise that if an accident occurs due to glare and distraction caused by any of your vehicles, BMW AG, BMW UK Ltd. and its directors could be deemed to be held personally liable unless corporate action is taken to stop the use of DRL on your vehicles in the UK.

We are sure that BMW would not wish to be associated with the causation of an increase in accidents to less conspicuous more vulnerable road users and therefore we look forward to seeing your vehicles using headlights only when conditions necessitate.

Please appreciate that we think there is some merit in non glaring DRL, the rim headlight LED system introduced by BMW is an excellent example. When used without tail lights this principle should be adopted by all other manufacturers.

Finally, please may I thank Joachim Scholtern and Dr. Klaus Scheuerer for their joint letter of 28th March 2003, their understanding of the issues involved is pleasing. The 5 series BMW I own is, in my opinion, perfection on wheels and your slogan that a BMW is the ultimate driving machine fully substantiated. I wish you every success with the new model.

Yours faithfully,

Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights www.dadrl.org.uk www.lightsout.org

CC

The Law Society
Association of British Insurers, Director Mary Francis, 51 Gresham Street, London, EC2V 7HQ
Council for the Protection of Rural England
Friends of the Earth
Pedestrians Association
Cyclists Touring Club
British Motorcyclists Federation
www.dadrl.org.uk website

Dr. Joachim Scholtern joachim.scholtern@bmw.de