



The Association of Drivers against
Daytime Running Lights
www.dadrl.org.uk

Marcin A Gorzkowski
Chairman Working Party 29 Lighting and Light-Signalling (GRE)
UN Economic Commission for Europe
Palais des Nations
CH - 1211 Geneva 10
Switzerland
Dear Mr. Gorzkowski,

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gorzkom@tc.gc.ca

26 June 2008

Vehicle Daytime Running Lights (DRL)

We understand that WP29 have mandated that vehicles worldwide should have dedicated DRL from 2012 and that existing vehicles should use low beam full power headlights with phased introduction from 2008.

This is despite unanimous opposition from vulnerable road users and a lack of real evidence in Europe that DRL are a benefit. This ruling based on flawed data, could expose you personally and members of your committee to charges of Corporate Manslaughter. DRL are a breach of your statutory duty for public protection, offend against the Equality Principle and violate Article Three of the Universal Declaration of Human Rights.

You are no doubt aware of the disastrous Austrian and Polish DRL experiments which resulted in increased accidents to vulnerable road users. Whilst DRL may show a benefit in the adverse conditions of Canada, and Sweden found DRL necessary when they changed from driving on the left, no EU country can show a DRL related reduction in accidents (ref MAG response to EC consultation paper 2006 by Dr. E.M. Hardy).

Our experts have shown that the academic studies relied upon by the EC use flawed methodology (see www.dadrl.org.uk/DRLstudies) some are meta analysis (i.e. studies of studies) biased to show a positive result. Fundamentally, it appears that the neither EC nor WP29 have taken expert ophthalmological opinion into account whereas Austria's government have done resulting in a ban on DRL in December 2007.

As a compromise, the Japanese Government conducted DRL experiments (which the UNECE have ignored) recommending that DRL should be no brighter than 200cd to protect vulnerable road users. It is folly to increase environmental pollution using high power glaring DRL to attempt to combat the intensity of the sun.

Please Mr. Gorzkowski, in the interests of protecting a driver's ability to perceive hazards that contribute to safe driving and to protect all vulnerable road users, could you urgently review your decision to use DRL?

Yours sincerely,

Roy Milnes

Campaign Co-ordinator DaDRL for and on behalf of:

The Association of Drivers against Daytime Running Lights

The British Motorcyclists Federation

The Motorcycle Action Group

The Federation of European Motorcyclists Associations

Living Streets – The UK Pedestrians Association

Federation of European Pedestrians Associations

European Cyclists' Federation

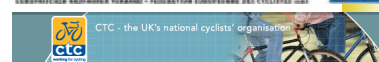
CTC, the national cyclists' organisation

The Royal Society for the Prevention of Cruelty to Animals

The Ramblers Association



FEPA



This is typical of the hundreds of comments we at DaDRL receive - how can DRL make Bruce Kemp feel a safe courteous driver if Daytime Running Lights cause this anguish?

Dear friends at Transport Canada,

June 2008

I am writing this letter to you hoping that there is some voice of reason out there in the worlds, especially on the roads. I was born in 1951. At that time we had a law about headlights. There were times when they could be bright and times when they had to be dim. I don't know where that law went. I spend half the time on the road now blind and long after I am home, I have bright spots as if I had gotten flash burns from welding. It seems that auto manufacturers took up the fad of some car owners who bought bright lights at car part stores and installed them on their cars and trucks. We used to call these "fog lights" and they were used for exactly that reason. Now they have degenerated into what is called "Daytime Running Lights".

What is the advantage of a daytime running light (DRL)? On a regular day when weather is good, it does no earthly good for the owner of the car that has them. They are burning mindlessly and sucking energy from the resources of the car. At night, they illuminate the entire countryside with candlepower that puts the old "brights" to shame. Usually DRL's are on by default when "dims" are on. That means a car has "dims" and DRL's (brighter than "brights") burning at the same time. During the daytime this is not necessary and at night, the brightness is debilitating. I often am not able to see for several seconds after encountering one such vehicle at night. I often flash them and they flash back. The resulting flash shows me that the "brights" are not as bright as the dim/DRL combination, but either is certainly brighter than the "brights" that I grew up with and would have been illegal at that time. The result is that the new light fad has "dims" AND something brighter than "brights" aimed at oncoming traffic, yet law enforcement is powerless or inept in enforcing the old laws.

Add to that the design of new headlights and I think we have a dangerous situation. Corning Glass was in the town where I grew up. My brother worked on the moulds that formed headlight lenses. There was a defined amount of diffusion of light that was required out of the finished product. There were no direct beams on the road. Light was dispersed so that there was no point in front of the lens that could blind an onlooker. NOW there is some kind of line in front of where a light shines. Above it, light is dim; below it the light is extremely bright. The theory is that the road directly in front of a car is bright, but it doesn't blind oncoming traffic. Good theory, but it does not take into account hills. Any time a car crests a hill, the "line" is pointed up into the air, blinding oncoming traffic. This is unacceptable. Two cars coming toward each other as the crest a hill are blinding each other at a time when each is trying to see what is on the blind side of the hill to which they are headed. So you have two people blinded by bright lights trying to recover ASAP so they can see what is on the other side of the hill.

What happened to laws? What happened to common sense? Have we given in to fads to sell cars even though it makes them more dangerous? Kids that have grown up with this look at it as a great thing because they can see better. They put even brighter aftermarket bulbs in their car to enhance their night time experience. What about the victims of these bright lights. I had one such person following me on an interstate for a LONG way. When he finally went around me, I flashed him. He slammed on the brakes, pulled in behind me again and turned on a bank of lights that could peel the paint of the back of my car. It seems that his "brights" were his dims and I had a headache from them. Then he decided to teach me a lesson and show me what REAL LIGHTS were!!!!

That police have not enforced existing laws is not an excuse. Bright lights are bright lights. Manufacturers have unleashed these bright lights in such numbers that police would have to ticket half the cars on the roads to be fair. I am asking for laws that address manufacturer who produce these blinding vehicles and force them to stop putting them on cars. The subjects of my complaints are DRL's and intense standard lights that are not diffused. These are especially dangerous for older drivers whose eyesight is not as forgiving as that of young kids.

Please consider this in your dealings with traffic laws, car manufacturers and any others who can effect change on the roads.

Thank you very much.

Bruce Kemp
Blacksburg, VA