

---

## Drivers Against Daytime Running Lights – UK

Loyola de Palacio  
EUROPEAN COMMISSION  
Office of Energy and Transport commissioner  
BREY 09/161  
Rue de la Loi 200,  
B-1049 Brussel  
Belgium

3 February 2003

Dear Mrs, Palacio,

### Daytime Running Lights

My profession is an Energy Auditor. Since starting my independent business in 1989 I have assisted Industry, Schools and Hospitals to save energy. I see you are going to address a Carbon Trust conference in April.

As I drive to survey sites, I witness a huge amount of energy waste from thousands of inefficient 55 watt tungsten halogen car headlamps burning unnecessarily in good daylight.

Since 1997 General Motors has forced most USA motorists to use daytime running lights (DRL). 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 \$600 million dollars using 406 million US gallons of fuel p.a. creating 33 million tonnes of carbon dioxide pollution p.a.\*\*

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 blaze around with headlights AND fog lights on or how many inconsiderate drivers use rear fog lights on motorways, 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!

President Bush and Prime Minister Blair may be about to commit troops to a war on Iraq for which oil supply is perceived by the general public to be a major factor. According to the London Times (Tuesday 14 Jan) North Sea oil is predicted to end by 2020.

Whilst the energy waste is a professional observation, my real concerns are the dangers daytime headlights create for other road users. I represent a group of experienced drivers in the UK called Drivers Against Daytime Running Lights (DADRL) and we have links to our parent organisation in the USA.

### Dangers to other drivers or "Safety claims"

We submit that the use and abuse of daytime headlights increases the dangers posed to vulnerable less conspicuous groups of road users. They reduce the ability of other drivers to perceive hazards. It is not people cocooned in padded metal boxes with multiple airbags who need protection but walkers, cyclists and motorcyclists who are far less visible to other drivers.

According to DoT figures, it is these groups who are suffering an increase in accidents despite a general reduction elsewhere in the UK. Since General Motors introduced DRL in the USA, there has been no benefit, in fact accidents to motorcyclists have increased.

On the basis that what happens in the USA today comes to the UK tomorrow, I append an email from Tom Frost an aggrieved cyclist from Pennsylvania. Some drivers misguidedly think it is safer, in reality the distraction and eye fatigue caused to other motorists puts all other less conspicuous, more vulnerable road users at risk.

There is no evidence to support extra safety. Various studies by Koornstra 1997, Elvic, Arora 1994, Andersson 1976, NHTSA 2000 et al claiming benefits have been proven to use flawed methodology \*\*.

Like the Emperor's new clothes, they are making fools of the world (in particular General Motors) with a marketing gimmick because "safety sells".

DADRL are a group of experienced motorists concerned about the safety of all road users. We have the support of the British Motorcyclists Federation, the Cyclist Touring Club and the Pedestrians Association. As you may be aware, due to representations by the Federation of European Motorcyclists Associations (FEMA) to the EU vehicle manufacturers (ACEA) were prevented from introducing DRL in 2002.

We believe 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.

In response to pressure from vulnerable road users, starting this week, the EU has commissioned a new report, but this will take two years to conclude.

### **A solution**

It is accepted that some form of low intensity DRL may be beneficial. As most vehicles have 5watt side lights built into the headlamp reflector giving a wide spread of luminance, would not the use of front side lights (not rear lights which detract from brake lights) be a more reasonable and acceptable solution? Long life Light Emitting Diodes could easily be developed for these lamps as light output is not critical and no extra costs would be incurred by manufacturers. Maybe the boy racers using blue illuminated screen washer nozzles are onto something?

We make submissions to government officials but find they are passing the buck. In the USA, the NHTSA refuses to decide if DRL are a good thing. The UK Minister of Transport says it up the EU commission, Neil Kinnock say it is up to member states. As for the media, what editor is likely to speak out against the power of Ford and General Motors when a large proportion of his advertising revenue comes from car adverts?

The new EU report is going to take two years. We submit that this will be too late. If experience form the USA is anything to go by, we will all be forced to use DRL simply because not to will put motorists at a disadvantage.

Mrs, Placaio, with your combined responsibility for EU Transport and Energy we believe you have the authority to stop this escalating waste and dangers to others, please can we ask for an immediate ban on DRL until the report is published?

If you are not agreeable, we submit that the present situation is untenable, so all vehicles should be made to use DRL with all the safety negative consequences for pedestrians, bicyclists and motor cyclists.

**Yours sincerely,**

**Roy Milnes UK co-ordinator Drivers Against Daytime Running Lights**

### **References:**

**[www.dadrl.org.uk](http://www.dadrl.org.uk)**

**[www.lightsout.org](http://www.lightsout.org)**

\*\* [www.howstuffworks.com/question424.htm](http://www.howstuffworks.com/question424.htm)

# Stephen Prower [30 years on: Do motorcar daytime lights reduce accidents?](#) + other BMF reports.

Subj: **Re: Fwd (Chainguard): Stupid daytime headlight use about to be promoted by PennDOT?**

Date: 14/01/2003 00:48:52 GMT Standard Time

At 02:28 PM 1/12/2003 -0800, you wrote:

>Hi Dave,

>

>My Susquehanna County Wheelmen snail-mail bicycle club newsletter that I sent you a while back that contained my article, "Lights Off For Safety", only has a circulation of about 30, and the one response that I got to that article was from a guy who disagreed and is for DRLs. On the other hand, there's one famous-in-Pa. bicyclist who's against DRLs – John Schubert, whose name I noticed on the Ban-DRLs petition back at around that time.

>Well just last night, I got around to submitting those arguments on why bicyclists should oppose DRLs, to a wider audience of bicyclists: Below is what I submitted. It's beginning to get at least some responses; it can all be found at [groups.yahoo.com/group/chainguard](http://groups.yahoo.com/group/chainguard)

>

>--- Tom Frost Jr <[tomfrostjr@yahoo.com](mailto:tomfrostjr@yahoo.com)> wrote:

>> Date: Sat, 11 Jan 2003 21:36:01 -0800 (PST)

>> From: Tom Frost Jr <[tomfrostjr@yahoo.com](mailto:tomfrostjr@yahoo.com)>

>> Subject: Stupid daytime headlight use about to be promoted by PennDOT?

>> To: [chainguard@yahoogroups.com](mailto:chainguard@yahoogroups.com) CC: [BicycleAccessCouncil@yahoogroups.com](mailto:BicycleAccessCouncil@yahoogroups.com)

>>

>> My question has been answered about what happened to the share-the-road logo that PennDOT had been printing on its envelopes: The Pa. Bicycle Access Council ([www.BicycleAccess-Pa.org](http://www.BicycleAccess-Pa.org)) reports, in its new e-mail list, that it's been notified by PennDOT that the logo is being discontinued on the envelopes. The excuse PennDOT gave is apparently that it will install, in place of it, propaganda about Pa.'s new set of laws >> about driving in construction zones.

>> Most of the provisions of that recently-passed bill are probably all well and good (based on my vague recollections of the snippet or two that I've read in the paper about it), except for one part - the part apparently instituting a requirement for burning headlights at all times in construction zones. If the legislators had had any common sense, the whole bill would have been shot down just for that. In my book, whatever safety increment is gained from such expanded headlight use, is in the ball park of the safety increment LOST as a result of the additional societal winking at speeding that has seemed to accompany the daytime-headlight-use trend.

>> It's hard to believe that I haven't seen discussion among cycling advocates everywhere, of the need to oppose this trend toward stupid daytime headlight use. (By "stupid", I mean during good-visibility weather and with no tunnels around - on types of vehicles other than the handful that might have a special conspicuity-need justification, such as bicycles, motorcycles and emergency vehicles).

>> The most obvious reason cyclists should oppose the trend is that EXCESS conspicuity on the part of one road user, ROBS conspicuity from another: Daytime cyclists have become harder for the oncoming traffic to see than we were in the days when most of the cars alongside us were properly unlit. The only way to counteract this effect would be to leave our bicycle headlights on in the daytime. That might be feasible sometimes for you or me (for an example of how, click onto the "Yukon Winter Cyclist" photo in [groups.yahoo.com/group/chainguard](http://groups.yahoo.com/group/chainguard) Message # 15107), but give me a break: We have enough work cut out for us just getting our fellow cyclists to use a headlight at NIGHT!

>>

An anti-daytime-headlight organization can be found at [www.LightsOut.org](http://www.LightsOut.org). An anti-daytime-headlight petition can be signed at [www.petitiononline.com](http://www.petitiononline.com) - "Ban Daytime Running Lights in the USA!", under "Politics and Government - USA".

>> - Tom Frost Jr.

Present DRL usage estimate	imported p.a.	Lifespan years	UK total		
Volvos	40000	12	480,000		
Saab	9000	10	90,000		
Copycat drivers			90,000		
Foreign cars			10,000		
Estimated total cars on UK roads using DRL			670,000	DRL parc	
Each vehicle	qty	watts	watts total		
Headlamps	2	55	110		
Rear lamps	4	5	20		
Instrument lamps	10	2	20		
Side bumper lamps	4	5	20		
Daytime lighting load			170 watts		
Alternator and drive belt efficiency losses		70%	243		
Chemical energy conversion into mechanical power		25%	971	Watts of fuel per vehicle	
Average vehicle mileage p.a. (RAC)			12,000		
Say 25% nighttime so daytime driving			9,000		
Average speed			35 mph		
Hours running in daytime			257 hours		
kWh per vehicle p.a.			250		
kWh total UK DRL parc			167,363,265 kWh	mWh	167,363
kWh per litre of fuel say diesel to be conservative			10.60		
Carbon Dioxide emissions			0.0002500 tonnes/kWh	Gallons	
Litres of fuel			15,788,987 p.a.	3,477,751	
Cost of fuel 23 Jan 2003	75 p/litre		£11,841,740		
Tonnes of fuel			15,789 p.a.		
Tonnes of CO2 emitted onto UK roads			41,841	Tonnes p.a.	

Total UK vehicle parc	imported p.a.	Lifespan years	UK total		
If all 26 million UK vehicles used DRL			26,000,000	DRL parc	
Estimated total cars on UK roads using DRL			26,000,000	DRL parc	
Each vehicle	qty	watts	watts total		
Headlamps	2	55	110		
Rear lamps	4	5	20		
Instrument lamps	10	2	20		
Side bumper lamps	4	5	20		
Daytime lighting load			170 watts		
Alternator and drive belt efficiency losses		70%	243		
Chemical energy conversion into mechanical power		25%	971	Watts of fuel per vehicle	
Average vehicle mileage p.a. (RAC)			12,000		
Say 25% nighttime so daytime driving			9,000		
Average speed			35 mph		
Hours running in daytime			257 hours		
kWh per vehicle p.a.			250		
kWh total UK DRL parc			6,494,693,878 kWh	mWh	6,494,694
All UK renewable generation 1014MW @ 30% load fact	304	8760		times	2.4
kWh per litre of fuel say diesel to be conservative			10.60		
Carbon Dioxide emissions			0.0002500 tonnes/kWh	Gallons	134,957,482
Litres of fuel			612,706,970 p.a.		
Cost of fuel 23 Jan 2003	75 p/litre		£459,530,227		
Tonnes of fuel			612,707 p.a.		
Tonnes of CO2 emitted onto UK roads			1,623,673	Tonnes p.a.	

Data sources

DEFRA "Environmental Reporting Guidelines for Company Reporting on Greenhouse Gas Emissions" revised guidelines March 2001.

[www.dti.gov.uk/newreview/nr54.pdf](http://www.dti.gov.uk/newreview/nr54.pdf)

British motorcyclists federation [www.bmf.org.uk](http://www.bmf.org.uk)

17 November 2003

John,

Many thanks for your reply, I would like to come to the presentation, but the day job prevents so certainly an open discussion paper would be of great value.

One final question if you don't mind:-

What is the intensity in candela and wattage of the proposed dedicated DRL low energy lamp that has just been approved by the UN-ECE 'GRE'?

I have heard that Hella have a 6 watt DRL part no 2PT 008 362-801 which can be used to produce an effective, wide-angle, long-distance, non-glaring DRL.

Best regards

Roy Milnes

11/17/2003

John,

I am most grateful for your detailed and informative reply, if you don't mind I have shared this with Stephen Prower of the BMF and Antonio Chello of FEMA. Please may I submit some immediate reactions.

It is very pleasing hear of the recommendation for a low intensity energy efficient DRL on new vehicles (and no rear lights) but certainly it is a dilemma for the existing vehicle parc.

We would not be happy with dipped beams - have you seen the recent letters in the Sunday Telegraph? I append them below - the letter titled Dazzle Danger from Doctor Henry Warson published yesterday about eye sensitivity is interesting.

On many existing cars most now have low level foglights which are either abused or rarely used - how about conversion to say a 12 watt lamp? Or as parking sensors are drilled into bumpers, the insertion of a row of bright 1 watt LED's? Or maybe two 7watt clusters to fit either side the air intake aperture.

Retrofit red LED strips for centre brake lights are available from Halfords - so why not retrofit white LED clusters?

Anyway as you say thought provoking and once again thankyou if you think we can contribute in any way possible please let me know.

Best regards

Roy Milnes

Research organization TNO

-----Original Message-----

**From:** RoyMilnes@aol.com [mailto:RoyMilnes@aol.com]

**Sent:** Saturday, November 15, 2003 10:43 AM

**To:** BERRY John (TREN)

**Subject:** Daytime Running Lights - Contract 2002/S 146-115430 effectiveness of DRLs

John,

Hello again,

I have been asked to speak on Radio 4 about DRL and was wondering about the status of the report you were commissioning into the effect on vulnerable road users.

Please do you know when the expected issue date is and are there any advance indications of its likely findings that you can release?

My regards to you

Roy Milnes

UK co-ordinator Drivers Against Daytime Running Lights

Subj: **Contract 2002/S 146-115430 effectiveness of DRLs**  
Date: 10/02/2003 22:50:54 GMT Standard Time  
From: Roy Milnes  
To: [John.Berry@cec.eu.int](mailto:John.Berry@cec.eu.int)  
File: **Review of the evidence DRL Sep2002.pdf** (351797 bytes) DL Time (40000 bps): < 2 minutes

John,  
Stephen Prower reminded me that the paper presented to the International Motorcyclists Conference at Munich on September 2002 may be of interest to your contractor as it pulls everything together in one cohesive document.  
May I attach it as a 344kb .pdf file which is also available as a download from [www.dadrl.org.uk](http://www.dadrl.org.uk) see Flawed Reports.  
Best regards  
Roy Milnes

>  
20 January 2003  
[John.Berry@cec.eu.int](mailto:John.Berry@cec.eu.int)

John,  
I am most grateful for your rapid response, it is pleasing to note the EU DRL study is to proceed and it seems an opportune time to make contact with you with the inaugural meeting next week. The two year timescale is a little disappointing.

In response to you request for relevant data, although it needs updating most of our information is at [www.dadrl.org.uk](http://www.dadrl.org.uk) and our USA link at [www.lightsout.org](http://www.lightsout.org).

Particularly relevant is the research done by Stephen Prower of the British Motorcyclists Federation:-  
30 Years on Do motorcar daytime lights reduce accidents  
Daytime Lights for Motorcycles  
Koorstra et al inconsistent methodology  
NHTSA 2000 method problem failure  
Daytime lights for motorcycles: Summary of current state of evidence'  
Bijleveld 1997: Calculation of odds-ratio values for Austria 1976-1995'  
Prevention of motorcycle "conspicuity" accidents

Also  
USA's Highway Loss Data Institute HILDI 1997  
Countermeasures for reducing the effects of Headlight Glare  
Inquiry into motorcycle safety in Victoria Australia  
Volvo Cars a danger at any speed?

John, I have zipped all the .pdf files together but please let me know if they do not come through.

Also I would hope the DRL study contractor would take into account expert Ophthalmic evidence on visual fatigue - anecdotal reports are coming in from the USA of this danger thus reducing a driver ability to perceive hazards.

Finally please can the views of these organisations be included:  
British Motorcyclists Federation  
contact [StephenProwerBMF@compuserve.com](mailto:StephenProwerBMF@compuserve.com)  
Pedestrians Association  
contact Terence Bendixson [tbendixson@onetel.net.uk](mailto:tbendixson@onetel.net.uk)  
Cyclists Touring Club Richard.Thomas@ctc.org.uk

My regards to you  
Roy Milnes  
UK co-ordinator Drivers Against Daytime Running Lights

Subj: RE: Contract 2002/S 146-115430 effectiveness of DRLs  
Date: 20/01/2003 11:28:10 GMT Standard Time  
From: [John.Berry@cec.eu.int](mailto:John.Berry@cec.eu.int)  
To: [RoyMilnes@aol.com](mailto:RoyMilnes@aol.com)  
Sent from the Internet ([Details](#))

The study contract has been awarded and the 'kick-off' meeting is next week. After which the study should take about two years to complete. If you have relevant data then may I enquire as to what it is?  
Thanks

John Berry

>-----Original Message-----

>From: RoyMilnes@aol.com [mailto:RoyMilnes@aol.com]  
>Sent: Monday, January 20, 2003 9:51 AM  
>To: BERRY John (TREN)  
>Subject: Fwd: Contract 2002/S 146-115430 effectiveness of DRLs  
>  
>  
>John,  
>Hello,  
>I understand you have taken on responsibility for the DRL study.  
>I would be most grateful if you would let me know the current position.  
>May I enquire what the time table is for this report, has it been  
>commissioned, when is it due and who is doing it as we would  
>like to make a  
>contribution.  
>Best regards  
>Roy Milnes  
>UK Co-ordinator Drivers Against Daytime running Lights

john.berry@cec.eu.int

20 January 2003

John,

Hello,

I understand you have taken on responsibility for the DRL study. I would be most grateful if you would let me know the current position.

Please may I enquire what the time table is for this report, has it been commissioned, when is it due and who is doing it as we would like to make a contribution.

Best regards

Roy Milnes

UK Co-ordinator Drivers Against Daytime running Lights

19 January 2003

Dear Rene,

Please may I enquire what the time table is for this report, has it been commissioned, when is it due and who is doing it as we would like to make a contribution.

Best regards

Roy Milnes

UK Co-ordinator Drivers Against Daytime running Lights

Rene.Bastiaans@cec.eu.int

18/08/2002

Contract 2002/S 146-115430 effectiveness of DRLs

Rene,

Hello, I represent Drivers Against Daytime Running Lights in the UK who are a group of responsible, experienced drivers who extremely concerned about the safety negative effects of DRLs on less conscious more vulnerable road users.

We have a parent organisation DADRL in the USA with a website [www.lightsout.org](http://www.lightsout.org) and work closely with UK motorcyclists organisations.

Recently we have been lobbying EU and USA car manufacturers. It is pleasing and encouraging that the EU commission prevent manufacturers from adopting DRL in 2002 and the you have initiated this new study, particularly as flaws have been found in previous research studies.

Please may I register an expression of interest and a request to participate with who ever wins the research contract?

My regards to you

Roy Milnes

UK co-ordinator Drivers Against Daytime Running Lights

---

## Drivers Against Daytime Running Lights

---

EUROPEAN COMMISSION  
Office of transport commissioner  
Office: BREY 09/161  
Rue de la Loi 200,  
B-1049 Brussel  
Belgium

**For the attention of Mr. Gert Jan Koopman**

**Dear Mr. Koopman,**

### **Daytime Running Lights (DRL's)**

I was most grateful for the information supplied with your letter of 30 March 1999. In return, may I enclose for your consideration a copy of a new report prepared by our technical expert titled Thirty Years on: Do motorcar daytime lights reduce accidents?

#### It commences:-

"In the winter of 1972, Finland made it compulsory for the drivers of all vehicles to have their lights on in daytime. The next two winters, fewer elk and deer happened to cross the road in daytime. So daytime multi-party accidents in Finland fell. On this basis in 1977 Sweden too made it compulsory for drivers to have their lights on in daytime all the year round".

#### And concludes:-

"A harsh verdict cannot be avoided. Motorcar daytime lights have important potential adverse side effects. The prima facie case in their favour is equivocal. Daytime lights must therefore be supported by evidence. However the evidence of the monitoring studies is conflicting, and inconclusive. Even if it were not so, the studies measure the effect of daytime lights by an unspecific method. Correspondingly their findings are worthless.

In 1972 daytime lights were first made compulsory in Finland. They have now also been made compulsory in at least five other countries. Yet thirty years on, a reduction of accidents from motorcar daytime lights remains unproven".

Drivers Against Daytime Running Lights have also researched General Motors USA claim of 5% accident reductions. Some of these relate to nighttime accidents and unless all vehicles are equipped with DRL's comparing one group with another is not valid. We also believe the general accident trend is falling. Analysis of the submissions the NHTSA 4124 docket indicates that 90% of respondents are against DRL's.

You may also be interested in our letter of 26<sup>th</sup> January to the UK DETR (copy attached) suggesting that in the year 2000 that motorists should be prevented from dazzling each other with glaring headlights and that light emitting diodes offer a safer way forward.

In your letter of 12 July 1998, you did advise me that it was up to member governments to decide upon the adoption of DRL's.

Please could you let us know if this is still the case and also in light of the enclosed report and alternative proposals do you still consider headlight based DRL's beneficial.

**Yours sincerely,**

**Roy Milnes - UK co-ordinator DADRL**

**cc BBC**

DADRL - Drivers Against Daytime Running Lights - a global organisation campaigning for safer roads



## Drivers Against Daytime Running Lights

European Transport Commissioner  
Office Brey 09/161  
European Commission  
Rue de la Loi 200  
B-1049 Bruxelles  
Belgium

08 March 1999

Dear Mr. Gert-Jan Koopman

### Daytime Running Lights (DRL's)

Firstly may I thank you for your letter of 27 January 1999 explaining the current EU position regarding the introduction of DRL's, this was most informative.

However we do remain to be convinced of any safety benefits, the perceived attitude of drivers using DRL's in the UK is that cocooned within their vehicles they adopt a barge on tactic regardless of other road users. This is a negative approach to safer driving, if another road user cannot see a vehicle in good daylight then their eyesight is defective and the danger to walkers, cyclists and equestrians is immense.

I believe that due to opposition from cyclists, a DRL law has not been implemented in the Netherlands.

There was press report last year that EU road casualties were little different from countries using DRL's than those not using DRL's.

EU road safety data for 1989 - 1995 shows that Sweden is not as safe as the UK despite the use of DRL's.

(source - The Times 03/06/98)	Fatalities per million miles
Britain	64
Sweden	65
Germany	116
France	145
Spain	147
Greece	195
Portugal	217

In Canada there was a 12% reduction in accidents when DRL's were introduced, but during the same period there was a similar decrease in accidents the USA which did not widely use DRL's at that time.

I understand in Australia that DRL's have been tried but abandoned due to no perceivable benefits.

Whilst DRL's may reduce one particular type of vehicle to vehicle accident, they can cause others due to visual distraction and fatigue, particularly with elderly drivers, not necessarily involving the DRL using vehicle. Our main concern is the increase in visual clutter causes confusion and fatigue putting all less conspicuous road users at risk.

Please may I ask if you have any comparative data from those countries using DRL's that demonstrates an overall safety benefit.

Secondly please may I ask if you would kindly send (or e-mail) me a copy of the page(s) from type approval directive 97/30/EC relating to the maximum light intensity permissible from vehicle headlights on low and high beams in the EU (or direct me to where I could look it up).

Whilst we may differ in our views, please may I thank you for your helpful replies to date.

Yours sincerely,

Roy Milnes

## **Drivers Against Daytime Running Lights**

**Neil Kinnock European Transport Commissioner.  
Office Brey 09/161  
European Commission  
Rue de la Loi 2000  
B-1049 Bruxelles  
Belgium**

**28 December**

**1998**

**Dear Mr. Kinnock,**

### **Daytime Running Lights (DRL's)**

You may recall that we corresponded during April regarding the merits/dangers of DRL's in the UK. Gert Jan Koopman kindly sent me a copy of the SWOV report. I was most grateful for his helpful and considerate response.

Since then, there is growing support to ban the use of DRL's in the UK due to the dangerous glare putting less conspicuous road users at risk from drivers suffering from visual fatigue. This view is supported by members of the Association of British Drivers, The British Motorcycle Federation and The Ramblers (over 30,000 members).

Due to these dangers, the USA NHTSA have issued a ruling that full power DRL's are to be banned in the USA (49 CFR571.108 docket No. NHTSA 98-4124).

On behalf of the above organisations, please may I submit a request for the Commission to propose that a similar ruling is adopted in the EU. I have written a similar letter to the DETR applicable to the UK.

**Yours sincerely,**

**Roy Milnes**

**enclosed  
copy letter to Gerry Kersey MD Volvo UK  
copy Volvo Cars - A danger at any speed**

**Neil Kinnock European Transport Commissioner**  
**8 Storey Gate**  
**London**  
**SW1P 3AT**

**14 April 1998**

**Dear Mr. Kinnock,**

**Use of Headlights in daytime**

I am concerned that the use of headlights in good daylight may become a European directive to the detriment of the majority of road users in the UK.

Volvo cars currently drive on headlights in daytime, I believe this is:-

- Dangerous and discourteous to other drivers because of the distracting dazzle.
- Causes extra unnecessary environmental pollution.
- Provokes road rage.

The DETR inform me that the UK government has assessed a report and that SWOV a Dutch (Volvos are made in Holland) research organisation is working for the European Commission into the effectiveness and use on all vehicles of headlamps or daytime running lamps but cannot say what the outcome is.

In case you have any influence on this subject, please may I enclose a letter to the DETR of 5<sup>th</sup> March 1998 setting out my detailed reasons for opposing this and their reply of 3<sup>rd</sup> April 1998.

may I thank you for your attention if there is any possibility of being informed what the conclusion of the UK report was, I would appreciate this.

**Yours sincerely,**