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***FEMA Comments on the Final Report on Daytime Running Lights***  
**Contract No. ETU/B27020B-E3-2002-DRL—S07.18830**

Dear Mr Maes,

FEMA very much appreciates being invited to contribute to the discussions on Daytime Running Lights (DRL) for all vehicles. Although unfortunately FEMA has not had the opportunity to be involved in the Project at an earlier stage, we were invited to the presentation of the draft report on 28 November 2003 and welcome the opportunity to comment on the Final Report on DRL issued on 20 October 2004. As anticipated on 28 November 2003, we would briefly like to present our comments on the Final Report.

Our main concern has been and continues to be the scientific approach chosen both for the collection and evaluation of data in the studies. This concerns mainly WP 2 and 3 of the DRL Project.

As far as WP 2 is concerned, the research conducted was limited to a re-analysis of accident statistics already available, the object being to avoid assessment errors due to misleading evaluation methods used in earlier studies, whilst still being able to make use of the raw data initially collected. However, although there is clear evidence to the extent that previous methods of data evaluation are misleading, it is unfortunate that the WP 2 study still avails itself of these very same methods, without properly addressing existing doubts about method. In addition, although the study identifies many potential sources of error, the conclusions arrived at are still being presented, without further detail, as "very robust". However, the study finds that, for instance, the effects of DRL on fatal accidents are "highly uncertain" (p. 6, point 7.a) or that the favourable effects on vulnerable road users are only "likely" (p.6, point 7.c), thus acknowledging a certain lack of scientific evidence.

In an effort to mitigate these shortcomings and not to rely solely on previously collected data, the WP 3 study commits to collecting additional data. However, this is being undertaken under laboratory conditions only, which in our view cannot provide a reliable basis for drawing



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conclusions on real-life situations. Most importantly, test persons have only been shown static situations on a computer screen, which are considerably different from a dynamic situation in traffic. In such real life situation, the road user has to perform the driving of his vehicle and is faced with multiple other dynamic sensorial inputs, such as other cars and motorcycles, passing pedestrians and cyclists, communication with other car occupants, operation of radio, mobile telephony, GPS...

Lastly, we would like to restate a concern we have raised earlier, jointly with other vulnerable road users' associations. The terms of reference of the DRL Project state its objective as "*(...) to assess the positive road safety effects of DRLs, and investigate possible negative effects*". We fear that this wording, put into the context of the implementation focus of the SWOV study in the Project's Work Package 4, might have been perceived as showing a slight bias in favour of a positive overall evaluation, or as not being entirely neutral towards a possible outcome of the project.

I also seize the opportunity to attach two documents addressing the study in more detail, which were prepared by the research officers of our two British associations, BMF and MAG UK.

We thank you very much for taking our concerns into consideration and look forward to your reply. We would appreciate to continue being involved in any future work, research or legislative initiative on DRL and conspicuity of road users.

Yours Sincerely,

Antonio Perlot  
Secretary General

Brussels, 28 January 2005