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# Drivers Against Daytime Running Lights – UK

James P. Vondale,  
Director Automotive Safety Office Environmental & Safety Engineering  
Ford Motor Company  
Fairlane Plaza South  
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Michigan  
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02 November 2003

jvondale@ford.com

Dear Mr. Vondale,

## Daytime Running Lights (DRL)

On July 24, 2002 you kindly responded to my letter suggesting that there was an opportunity for Ford to gain marketing opportunity over GM by adoption a less glaring form of DRL based on long life Light Emitting Diodes (LED).

We at DADRL appreciated your considered response and you asked for evidence of a scientific study that supports this claim or that DRLs create disabling glare to other motorists.

Please may we respond by referring you to Perlot & Prower 2003 available as a down load from our website [www.dadr.org.uk](http://www.dadr.org.uk) which concludes:

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.

We have formally issued this to Dr. Wolfgang G. Schneider Vice President Ford Europe and Mr. Hugh Reid Managing Director of your subsidiary Volvo Cars UK plus all other auto manufacturers involved in the UK advising that with the issue of this document that they could be held legally liable for DRL related accidents.

Probably this has caused GM to publish the article on USA Today on 28 October to defend their commitment to high beam filament DRL. We are questioning their claim of 37,000 accidents saved particularly as we see in Europe accidents increasing to less conspicuous more vulnerable road users.

Providing you could persuade Volvo to fall back to the dimmed dipped beam lighting used on early 340 models, we submit that Ford USA could gain massive public support and wrong foot GM by adopting non glaring LED as soon as possible particularly as the NHTSA is about to rule on a lower level of intensity.

Using limited life filament based lamps for this safety critical function is wrong when LED technology continues to improve current 1 watt types offering 60,000 hours of robust usage.

In view of GM's onslaught, it may be an opportune time for Ford to consider this proposal, we would be very interested in your response.

Yours faithfully,

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights**  
[www.dadr.org.uk](http://www.dadr.org.uk)  
[www.lightsout.org](http://www.lightsout.org)

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# Drivers Against Daytime Running Lights – UK

Dr. Wolfgang G. Schneider Vice President  
Ford of Europe GMBH  
Legal Governmental and Environmental affairs  
Koeln-Niehl  
Henry-Ford Strasse 1  
D-50725  
Koeln  
Germany  
Dear Dr. Schneider,

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15 October 2003

## Daytime Running Lights (DRL)

I thank you for your letter of June 3<sup>rd</sup> 2003. It is with disappointment to note that despite previous representations to yourself, William E. Ford Jnr. and Volvo UK that you continue to produce vehicles with DRL contravene the UK law.

Full power low beam DRL (and particularly those glaring HID lamps), means every time a Volvo 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.

We submit that daytime headlights are marketing gimmick which may be valid in the wastes of Sweden but in densely populated highly urbanised countries they cause a danger all other less conspicuous road users, a group to whom accidents are increasing in the UK, and also 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](http://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](http://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.

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, Ford of Europe GMBH, Ford Motor Company Ltd, Volvo UK Ltd, Jaguar Cars 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. As many of your vehicles are company owned, the Health and Safety Executive may also become involved.

We are sure that Ford GMBH and its subsidiary companies 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 understand that we think there is some merit in non glaring DRL, the dimmed dipped headlights used by early Volvos is an excellent example. When used without tail lights, this principle or the rim LED lights used by BMW, should be adopted by all other manufacturers.

**Yours faithfully,**

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights**  
**[www.dadrl.org.uk](http://www.dadrl.org.uk)**  
**[www.lightsout.org](http://www.lightsout.org)**

cc

Health and Safety Executive

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](http://www.dadrl.org.uk) website

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## Drivers Against Daytime Running Lights – UK

Mr. David Thursfield                      Ford of Europe President, Chairman and Chief Executive Officer  
Ford of Europe c/o Ford Motor Company Central Office  
Eagle Way  
Brentwood  
Essex CM13 3BW

16 May 2002

Dear Mr. Thursfield,

### Daytime Running Lights (DRL)

Following the Federation of European Motorcyclists Association (FEMA) press release 03 May 2002 announcing that European Car Manufacturers (ACEA) have withdrawn their proposal to universally equip all vehicles with DRL, please accept my suggestion that the Ford Motor Company continue its policy of respecting responsible drivers.

Vehicles using DRL are increasingly viewed as pariahs as they cause a danger to all less conspicuous and vulnerable road users. The lights are too bright; they obscure and reduce a driver's ability to perceive hazards by reducing rear vision and limiting vision of oncoming traffic. This creates unnecessary stress for other drivers and decreases their personal safety.

The various EU reports (e.g. SWOV by Koornstra et. al) have been discredited; even the U.S. National Highway Traffic Safety Administration (NHTSA) admits these pro-DRL "studies" incorporate flawed methodology.

As automobile, truck, motorcycle, bicycle, and pedestrian organisations unite against the irritating glare and distraction caused by DRL, certain manufacturers persist in promoting DRL mandates as a sales gimmick.

We are patiently waiting for responsible research that will identify and document the counter productive and unintended consequences of widespread DRL use.

You may be aware that USA's National Highway Traffic Safety Administration (NHTSA) is protractedly deliberating what to do about DRL. In June 2000 they issued a General Motors influenced report (DOT HS 808 645) claiming benefits but have not issued a ruling. Analysis indicates basic flaws such as inclusion of night time data this distorting the results. Sadly as DRL usage increases, motorcycle accidents in the UK and USA are increasing, the NHTSA are conveniently ignoring this fact.

Ford have a unique opportunity at this moment in time to adopt a more sensible approach to drivers needs by adopting non glaring DRL (such as 5 watt lamps combined in the head lamp lens or LED's). The rim LED system being introduced by FORD OF EUROPE (who also manufacture motorcycles) is an excellent example.

Rejecting the installation of dangerous DRL whilst the NHTSA are sitting on the fence would allow Ford to demonstrate a responsible attitude toward all vulnerable road users by responding to safety concerns.

We think distraction of a drivers attention from all sources will become a major future safety issue.

In view of the ACEA decision, we are updating our 2000 survey of motor manufacturer's policy on DRL and would appreciate a formal response on where Ford of Europe stands on this issue.

Yours faithfully,

Roy Milnes

UK co-ordinator

\*Drivers Against Daytime Running Lights \*

**Attached** FEMA 03 May 2002– Car manufacturers decide not to commit themselves.  
British Motorcyclists Federation Thirty years on: Do motorcar daytime lights reduce accidents?  
**Reference** [www.lightsout.org](http://www.lightsout.org)  
<http://insecuriteroutiere.free.fr/accueil.htm>  
[www.headlights-are-too-bright.com](http://www.headlights-are-too-bright.com)

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## Drivers Against Daytime Running Lights – UK

Mr. William Clay Ford, Jr  
Ford Motor Company  
One American Road  
P.O. Box 1899  
Dearborn MI 48126

Chairman of the Board

16 May 2002

Dear Mr. Ford,

### Daytime Running Lights (DRL)

Following the Federation of European Motorcyclists Association (FEMA) press release 03 May 2002 announcing that European Car Manufacturers (ACEA) have withdrawn their proposal to universally equip all vehicles with DRL, please accept my suggestion that the Ford Motor Company continue its policy of respecting responsible drivers.

Cars using DRL are increasingly viewed as pariahs as they cause a danger to all less conspicuous and vulnerable road users. The lights are too bright, they obscure and reduce a driver's ability to perceive hazards by limiting vision of oncoming traffic and reduce rear vision. This creates unnecessary stress for other drivers, motorcyclists, cyclists, and pedestrians.

The various European Union reports (e.g. SWOV by Koornstra et. al) have been discredited; even the U.S. National Highway Traffic Safety Administration (NHTSA) admits these pro-DRL "studies" incorporate flawed methodology.

As pedestrians, cyclists, motorcyclists and drivers organisations unite against irritating glare and the distractions related to DRLs, certain manufacturers persist in promoting DRL mandates.

We are patiently waiting for responsible research that will identify and document the counter productive and unintended consequences of widespread DRL use.

You may also be aware that USA's National Highway Traffic Safety Administration is protractedly deliberating what to do about DRL and have issued a General Motors influenced report during 2000 claiming benefits. Analysis indicates basic flaws such as inclusion of night time data which distort the results. Pedestrian, cyclist and motorcyclist data was ignored. Sadly motorcyclist accidents in the UK and USA are increasing as DRL usage increases.

May we suggest that Ford have a unique opportunity at this moment in time to adopt a more sensible approach to drivers needs e.g. using 5 watt non glaring DRL combined in the head lamp lens or LED's. The rim LED system being adopted by FORD OF EUROPE (who also manufacture motorcycles) is an excellent example.

Rejecting the installation of DRL whilst the NHTSA are sitting on the fence would allow Ford to demonstrate a responsible attitude toward all vulnerable road users by responding to safety concerns.

We think glare and distraction of drivers attention from all sources will become a major future safety issue.

In view of the ACEA decision, we are updating our 2000 survey of motor manufacturer's policy on DRL and would appreciate a formal response on where Ford of America stand on this issue.

Yours faithfully,

Roy Milnes

UK co-ordinator

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FEMA 03 May 2002– Car manufacturers decide not to commit themselves.  
British Motorcyclists Federation Thirty years on: Do motorcar daytime lights reduce accidents?

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[www.lightsoout.org](http://www.lightsoout.org) <http://insecuriteroutiere.free.fr/accueil.htm>