



**Ford of Europe GmbH**

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June 3, 2002

Daytime Running Lights (DRL)

Dear Mr Milnes,

Thank you for your letter addressed to David Thursfield and dated 16 May 2002

As you know, the Council of Ministers made it a condition of their acceptance of the Pedestrian Protect agreement. that "the daytime running lights (DRL) measure should be deferred until the technical procedures have been defined". The duration of this deferral is yet to be established.

Ford Motor Company, along with the other ACEA members will abide by this decision and has no plans to introduce DRLs except as we may later be required to do by this modification to the agreement or by a future regulation. We do, of course, provide DRLs on vehicles sold in Scandinavia, where drivers have a legal obligation to show lights during daytime.

We recognise that there is still considerable debate over the level of safety benefit provided by DRLs, but we believe the various studies show that there is an overall safety benefit. This, of course, has to be set against the cost both to the user and to the environment (increase in CO2 produced). On the other hand, while we recognise the concern on relative conspicuity, especially from motorcyclists, we are unaware of any scientific evidence to endorse the claim that DRLs have a negative effect on conspicuity (and therefore safety) of motorcyclists and other vulnerable road users, or that they cause undue glare to other drivers.

With reference to your suggestions on suitable non-glaring devices, we are, of course, examining a number of possible options but, as the Council pointed out, the details of devices that will be permitted are not yet finalised so we cannot complete our plans at this stage.

Yours faithfully

Dr. Wolfgang G. Scheider



James P. Vondale, Director Automotive Safety Office Environmental & Safety Engineering

July 24, 2002

Mr. Roy Milnes  
8 Millers Meadow Rainow Macclesfield Cheshire SK10 5UE England

Dear Mr. Milnes

Subject:

Daytime Running Lights (DRL)

Your letter addressed to William Clay Ford, Jr. dated 16 May 2002 was forwarded to my office for response. Thank you for your letter regarding the safety of Daytime Running Lamps.

We are aware of the National Highway and Traffic Safety Administration (NHTSA) proposed rulemaking to revise the photometric performance requirements to reduce glare of optional Daytime Running Lamps (DRLs) published on August 7, 1998 and await the Final Rule scheduled to be published in the summer of 2002. We are also familiar with the NHTSA preliminary assessment of the crash-reducing effectiveness of passenger car DRLs and of various Canadian Ministry of Transport DRL studies. These studies and others indicate that DRLs may provide an overall safety benefit, however there are costs to equip vehicles and to operate the vehicle, i.e. higher fuel consumption and exhaust emissions. We recognize the concern of reduced motorcycle conspicuity, but are not aware of any scientific study that supports this claim or that DRLs create disabling glare to other motorists.

All Ford Motor Company vehicles sold in Canada are equipped with DRLs as required by CMVSS 108 and DRLs are available in the US for most vehicles for Fleet sales or aftermarket installation. Your suggestions relative to potential non-glaring DRL devices will be evaluated relative to the legal requirements that are applicable to DRLs in various markets. However, a device used to provide the DRL function must provide sufficient light output to increase vehicle conspicuity for any potential benefit to result.

Ford Motor Company constantly examines vehicle designs, systems and components to further improve the safety of occupants of our vehicles and highway safety in general. We will continue to review the potential benefits and potential negative effects associated with Daytime Running Lamps.

Sincerely,

James P. Vondale

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