

To European Commission  
Directorate General for Energy and Transport  
Road Safety Unit "DRL"  
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From: National Motorists Association, USA

SAVING LIVES WITH DAYTIME RUNNING LIGHTS (DRL)  
A Consultation Paper

The following represents our comments on the proposal to mandate the use and installation of Daytime Running Lights (DRLs).

This report appears to be an effort to simply promote the use and installation of DRLs in the European Union. As a result there are omissions, errors in fact, and misrepresentations of material issues that taken as a whole result in conclusions that are not supportable in any reasonable context. For example, the report claims that all studies of DRL effectiveness have very similar outcomes and all support the safety benefits of DRL use. This is not true. The only large scale analysis of DRLs in the United States, conducted by the Insurance Loss Data Institute, found no safety benefit related to DRL use. Even if the authors of the EU report disagree with the findings of this analysis they should have still acknowledged its existence. They should have also acknowledged the consistent and documented criticisms of the methodologies employed in the pro-DRL studies.

To state "glare" is not a factor in DRL use, in particular daytime headlight use, ignores one of the most consistent complaints from highway users, concerning DRLs. In fact, some DRL advocates take the position that their conspicuity is even further enhanced by the use of high beam headlights and act accordingly. This may not be an issue with low wattage dedicated DRLs, but it certainly resonates with the use of daytime headlight use. The fact that human beings can "get used" to irritants and distractions does not justify the implementation of a DRL mandate (the Canadian rationalization).

The entire DRL concept requires a suspension of reason. Yes, one light on a road will attract attention, but it will also distract attention from unlit objects on that same road. One hundred lights on the road and none will attract individual attention and all unlit objects become largely invisible. Daytime Running Lights elevate the minimum conspicuity requirements for all road users. That means any person, vehicle, animal, or object without DRLs becomes less conspicuous.

The off-hand dismissal of the possible negative effect on motorcyclists, while perhaps true, did not go the next step and explain the rationale for this conclusion, i.e. that there seemed to be no safety benefit attributable to daytime headlight use on motorcycles. And, subsequently this was not followed by an explanation of why, if daytime headlight use does not improve motorcyclist safety, daytime headlight use will improve the safety of automobile occupants?

There is no mention in this report of the fact that DRLs, even dedicated DRLs, significantly mask directional lights (turn signals). In most instances this is just an annoyance and a hindrance to smooth traffic flow, but there are safety implications when other motorists are unable to gauge another driver's intentions.

I recognize that it is difficult, if not futile, to measure the actual effects of widespread DRL use in a population of millions of vehicles being used in different environments, for different purposes and under diverse conditions. The chronic public policy error is to assume that a net benefit (far from proven) justifies mandating universal usage. There may be times and places and situations where DRLs are hugely beneficial (low light, sparse traffic, poor visibility etc.) and times when DRL use is detrimental and counter-productive (high ambient light, heavy traffic,

high numbers of non-motorized road users). The safety benefits attributed to the first situation do not justify the acceptance of the negatives characteristic of the second situation.

Lost in this entire discussion is the role of scale. Simplistically, the proponents of increased conspicuity in general and DRLs specifically, argue that a car with its headlights on is easier to see, therefore if all cars have their headlights on they will all be easier to see. This completely ignores the effect of scale. A simple example: If one person stands in a crowded theater, while everyone else is seated, he is easily seen and he also sees better than anyone else in the theater. However, if everyone in the theater stands, no one is uniquely visible and no one sees any better than when they were sitting. Furthermore, those who cannot stand cannot be seen at all, nor can they see anything beyond their immediate surroundings. So it is with widespread DRL use, worse yet mandated DRL use.

Once DRL use/installation is mandated, public agencies will be loath to admit they were wrong, or to reverse course and repeal the mandate. This is not a law that the public is standing in the streets and demanding. Furthermore, if the public knew and understood the negative consequences of widespread DRL use it might well ask that daytime headlight use be limited to low light and low visibility situations, where it potentially serves a useful purpose.

Sincerely,

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