

Date: Mon, 13 Nov 2006 17:25:04 +0000
To: tren-e3-consultation@cec.eu.int
From: SGS
Subject: Proposed mandatory introduction of DRL in Europe

To Whom it may Concern.

I am writing to say that I am utterly opposed to any introduction of mandatory Daylight Running Lights in the EU - particularly in the UK, where I live. Indeed, I suggest the opposite: car manufacturers should be forced to fit an OFF switch to prevent the increasing glare and distraction these lights cause.

I am predominately a cyclist and often a motorcyclist. As a cyclist, I have often have problems with motorists failing to see me (or more likely, failing to register my presence) until the last minute, despite wearing conspicuous clothing and being lit at night. This situation is getting worse in the UK, now more cars are being fitted with DRL by their manufacturers. My Volvo 850 was so equipped until I removed the 'feature'. The problem was noticeably worse in Denmark, where DRL has been compulsory for cars for some time, when I took a cycling holiday there in 1996.

Many motorcyclists in the UK and elsewhere have, for some time, used headlamps in daylight to increase their conspicuity to other road users. This would completely be annulled in a general 'sea' of car headlamps, which often are much brighter. A study by the Japanese government upholds this fact.

I would point out that many classic vehicles do not have a charging system that can keep the battery fully charged at constant low road speeds if the headlamp(s) are on continuously. You mention the possibility of exemption with an arbitrary date of manufacture pre-1970. This would be difficult to police. Since the lighting systems of such vehicles are generally much weaker than those on modern vehicles, they too would become less conspicuous in a general sea of headlamps, whether they had their lights on or not.

In my experience, the following statements in your consultation paper dated 1st August 2006 are COMPLETELY UNTRUE:

'Road users not having lighting devices, i.e. pedestrians, cyclists, mopeds do not become less conspicuous if all vehicles feature DRL'

THEY DO IN MY EXPERIENCE - AND THIS SHOULD BE OBVIOUS TO ANYONE.

'Dedicated DRL and dipped headlamps do not cause glare'

ALL HEADLAMPS, PARTICULARLY THE LATER GAS DISCHARGE TYPES, CAUSE GLARE.

The situation in the UK now is so bad I cannot drive at night without getting a headache. It is very noticeable how many badly adjusted headlamps there are when Daylight Saving time ends, which cause even more glare. Although this is a matter for the police, it is not being properly addressed in the UK. Mandatory DRL would just exacerbate the problem.

You asked for replies to your suggestion that motorcycles could be distinguished with a different colour light. Since this would imply a colour filter where the lamp source is tungsten lamp, this would obviously reduce the efficiency of the lamp. Since the primary function of a headlamp is to see WITH, this is not an option in my opinion. A driver needs to see properly without a colour cast that might mask some objects on the road ahead.

There has been a general increase in brightness of vehicle headlamps over the last few decades, which has steadily made driving at night more stressful. This has made vulnerable users such as cyclists LESS conspicuous without improving an individual driver's ability to see the road ahead more clearly at night.

The EU should instead be considering an upper limit to the brightness of vehicle headlamps throughout Europe. This should be expressed in light units, e.g. Candelas, NOT electrical power in, to cover the different luminaire technologies that are now available.

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Regards,

Steve Glennie-Smith