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John W. Pearson, MD

Friday, August 28, 1998

NHTSA - 98-4124-62
Docket Management Room PI 401
400 Seventh St. S.W.
Washington, D.C. 20590

DEPT. OF TRANSPORTATION
DOCKET SECTION
98 SEP - 1 PM 2: 21

Dear Sir / Madam:

Reference to: **Docket No. 984124**

I write to oppose the proposed rules regarding daytime running lights for vehicular road traffic.

Intuition is an unscientific basis on which to base rules. These rules, even as modified, have NOT been shown to reduce accidents, injuries, or deaths. With the large number of private vans on the roads now, along with buses and heavy trucks, we are frequently dazzled in daylight hours by lights in the vehicle just behind us. It does no good to adjust the rear-view mirror since then, during these same daylight hours we can see no details of what is behind us.

It seems that perpetuation of the agency by finding ANYTHING to do is the real motive. If **safety** of drivers, passengers and pedestrians were truly your aim there are other efforts that have been shown over and over again to be beneficial.

Drivers' education is an obvious area. The encouragement of driving schools where safe handling of vehicles were taught might be a great start. I have attended a number of 'safety schools' sponsored by a local automobile marque club. These did not involve racing, taught techniques such as lane-changing, anti-lock braking, safe cornering, and were followed by a low-key autocross demonstration and runs. I have learned much about car handling and self-handling this way. To actively encourage this would be worthy of you. We have met obstruction rather than **encouragement** from our State (in making sites difficult to obtain), and have noticed only indifference from the local police department. Can you do better?

In sum, **DRLs** have no proven benefit, have disadvantages, and I plead that they NOT be made mandatory.

Yours truly,

