



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

**INFORMATION Redacted PURSUANT TO THE FREEDOM OF
INFORMATION ACT (FOIA), 5 U.S.C . 552(B)(6)**

May 16, 2017

[REDACTED]
Boston, MA [REDACTED]

NEF-109 am
Ref. No. 10980570

Dear [REDACTED]

Thank you for your correspondence concerning the headlights on model year (MY) 2017 Land Rover Range Rover vehicles. The National Highway Traffic Safety Administration's (NHTSA) Office of Defects Investigation received your correspondence. I am pleased to respond and regret any inconvenience our delay in responding may have caused you.

NHTSA is the Federal agency responsible for improving safety on our Nation's highways. We are authorized to order manufacturers to recall and repair vehicles or motor vehicle equipment when our investigations indicate that they contain safety defects in their design, construction, or performance. We also monitor the adequacy of manufacturers' recall campaigns. In order for the agency to initiate an investigation, we look carefully at the body of consumer complaints and other available data to determine whether a defect trend may exist. We do not have authority to act on isolated problems or resolve disputes between individual owners, dealers, or manufacturers.

You indicate that MY 2017 Land Rover Range Rovers have exceptionally bright headlights, which makes it difficult to see when driving towards or away these vehicles. You state that the height of the vehicle further exacerbates the problem. Even with low beams there is still a safety concern to motorists who approach these vehicles or view them in rear view mirrors. You feel the xenon headlights are dangerous and should be dimmed or aimed downward so that they are not blinding other drivers in lower riding vehicles.

NHTSA has a safety standard for lamps, reflective devices and associated equipment. The purpose of this standard is to reduce crashes and injuries by providing adequate illumination of the roadway and by enhancing the visibility of motor vehicles on public roads. For headlamps, Federal Motor Vehicle Safety Standard No. 108 contains intensity and color requirements in order to balance seeing distance needs while limiting glare to other drivers.

Older technology halogen headlamps do have a yellow tint as opposed to the more recently introduced high-intensity discharge (HID) light-emitting diode (LED) and xenon headlamps, which produce a whiter color with a slight blue tint. Some consumers have associated this whiter color with glare and in response, NHTSA conducted research to further our understanding of the subject. We are currently re-examining the issues related to glare produced by headlamps on newer vehicles. A summary of the report is on our website at www.nhtsa.gov/cars/rules/rulings/glare.html. One of the conclusions that we found was that glare with a bluish tint may cause more discomfort, but it does not decrease a glared drivers seeing distance.

NHTSA has also determined that the mounting height of oncoming headlamps affects discomfort glare. A common tendency is that as the mounting height increases, glare is also increased. The increase in glare results in increased discomfort and reduction of visual performance (i.e., increased reaction times to detect objects and decreased detection distances). In addition, the agency has taken actions against importers of HID retrofit kits. These kits may not be manufactured or imported into the United States. It is illegal to install an HID headlight and wiring harness into a vehicle that originally came equipped with traditional halogen bulbs from the manufacturer. These vehicles lack a reflector used with HID systems, which reduces glare to oncoming drivers.

Should you encounter a safety-related problem with a motor vehicle or motor vehicle equipment in the future, we would appreciate it if you would complete an electronic Vehicle Owner's Questionnaire online at www.nhtsa.gov or call the Auto Safety Hotline at 888-327-4236. Also, a summary listing of vehicle owners' complaints, safety recalls, manufacturers' service bulletins, etc. can be obtained at our website.

Sincerely,



Randy Reid, Chief
Correspondence Research Division
Office of Defects Investigation
Enforcement