



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

SEP 19 2006

Dan G. Dobbins  
Executive Vice-President  
Program Management, Product Engineering & Technical Support  
Guide Corporation  
600 Corporation Drive  
Pendleton, IN 46064-8608

Dear Mr. Dobbins:

This is in reply to your letter of August 30, 2006, in which you requested the National Highway Traffic Safety Administration (NHTSA) to change its description of the safety consequences that may be associated with the noncompliance Guide Corporation identified in certain headlamps it manufactured. That noncompliance concerned the misalignment of the low beam pattern in those headlamps which could result in headlamp glare to both oncoming and preceding traffic.

In our description of the safety consequences associated with this noncompliance we stated, "too much light in certain points of the headlamp could create a distraction, possibly resulting in a vehicle crash." You asked us to reconsider the latter phrase "possibly resulting in a vehicle crash," and replace it with "possibly resulting in disturbing glare." In support of your request, you acknowledged that a misaimed headlamp is a potential cause of glare, and that the consequences of headlamp glare are varied. You asserted, however, that there is a lack of objective data demonstrating that glare adversely affects vehicle safety, and that in your view neither the lighting industry nor NHTSA is aware of any evidence that demonstrates the existence of disability glare. In support of the latter position, you referenced a presentation an industry representative provided during a NHTSA workshop.

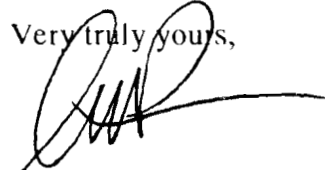
We have considered your request and are denying it. Although it may be true that there has been significant debate surrounding the severity of consequences associated with headlamp glare that does not detract from the possibility, however remote a manufacturer may view it, of a crash due to an oncoming driver's being temporarily blinded from headlamp glare. Further, the recalling of motor vehicle equipment, as contemplated under The National Traffic and Motor Vehicle Safety Act of 1966, as amended (Act), 49 U.S.C. 30101et seq., is a prophylactic measure intended to prevent motor vehicle crashes. Accordingly, even assuming there is a lack of objective data linking headlamp glare to motor vehicle crashes, we do not view that factor as dispositive. Rather, we believe the more prudent course of action, and the one more consistent with the Act's goal of preventing motor vehicle crashes and the injuries and deaths that may result from them, is to warn of the potential consequence of a motor vehicle crash.



VEHICLE SAFETY HOTLINE  
888-327-4236

By way of reminder, the notifications Guide Corporation issues to owners and purchasers must contain an evaluation of the risk to motor vehicle safety related to the noncompliance. When a vehicle crash without warning is a consequence, certain information must be included. If a vehicle crash is not a consequence, the evaluation must nevertheless include a statement indicating the general type of injuries that may occur, in addition to a description of any prior warning that may occur. For more details on this requirement, and the other requirements associated with the notifications, please consult 49 CFR § 577.5.

Very truly yours,

A handwritten signature in black ink, appearing to read 'G. Person', with a long horizontal flourish extending to the right.

George Person  
Chief, Recall Management Division  
Office of Defects Investigation