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U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

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SFL108

MAR 13 2003

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

Mr. Galen Chen
Marketing Department
Maxzone Vehicle Lighting Corp.
5100 Walnut Grove Avenue
San Gabriel, CA 91776

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MAIL ROOM

Dear Mr. Chen:

This is in reply to your email (copy enclosed) concerning replacement lighting equipment. We apologize for the delay in our response.

You reported that your company is developing "a new headlamp" for 1998-2001 model Honda Accord passenger cars (we shall refer to this as the "Maxzone headlamp"). You informed us that the original equipment (OE) headlamp for these vehicles consists of "High Beam (9005 bulb), Low Beam (9006 bulb), Park Signal and reflector. No fog lamp function." (We would also note that the OE headlamp on this model Honda Accord appears to incorporate the required front turn signal and side marker lamp as well.) The Maxzone headlamp consists of "High Beam (H1 bulb), Low Beam (H3 bulb), Park Signal and we've added Fog Lamp (H3 bulb) to this headlamp assembly. It also comes with reflector." You informed us "the numbers of different functions after tests all pass SAE/DOT requirements." You asked whether the Maxzone headlamp could be certified and sold as legal replacements for the 1998-2001 Honda Accord models. As discussed below, the answer to this question is no.

Under S5.8, *Replacement equipment*, of Standard No. 108, "Each lamp . . . manufactured to replace any lamp . . . on any vehicle to which this standard applies, shall be designed to conform to this standard." (S5.8.1)

S7.1 of Standard No. 108 requires a motor vehicle, other than a motorcycle, to "be equipped with a headlighting system designed to conform to the requirements of S7.3, S7.4, S7.5, or S7.6." Maxzone stated that the OE headlighting system on the 1998-2001



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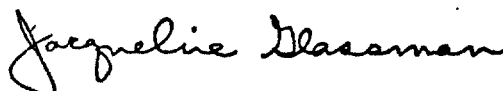
Honda Accord consists of headlamps with HB3 (9005) and HB4 (9006) replaceable light sources. Thus, a replacement headlamp for this vehicle must be evaluated according to the requirements of S7.5, *Replaceable bulb headlamp systems*.

S7.5(b) requires that each headlamp in the system be designed to conform to the photometrics as specified in S7.5(c) through (e) using any light source of the type intended for use in such system. Considering that this particular vehicle incorporates HB3 and HB4 replaceable light sources in its OE headlighting system, we view S5.8.1 and S7.5(b) as requiring each replacement headlamp for this vehicle to be designed to conform to the specified photometry when using HB3 and HB4 replaceable light sources. Because replaceable light sources are, by regulation, designed to be non-interchangeable, it would not be possible for the Maxzone replacement headlamp to comply with the applicable photometry using HB3 and HB4 replaceable light sources when the Maxzone headlamp is designed to use replaceable light sources other than HB3 and HB4. Therefore, the Maxzone headlamp could not be certified and sold as a replacement for a 1998-2001 Honda Accord headlamp. This also means that a headlamp dealer or motor vehicle repair business could not remove the original headlamp and install the Maxzone headlamp as a replacement without violating 49 U.S.C. 30122. This section prohibits manufacturers, distributors, dealers, and motor vehicle repair businesses from making inoperative equipment installed in accordance with a Federal motor vehicle safety standard.

You also informed us that the Maxzone headlamp "comes with reflector." We are unsure of your meaning. We interpret S5.8.1 as requiring replacement lighting equipment designed for specific motor vehicles to incorporate, at a minimum, the same required functionality as included on the original equipment lamp it is intended to replace. If the original Accord headlamp incorporated an amber side reflex reflector in compliance with Standard No. 108, each replacement headlamp for that Accord must also incorporate an amber side reflex reflector if we are to regard it being "designed to conform to this standard" within the meaning of S5.8.1.

I hope that this information is useful to you. If you have any questions, you may call Taylor Vinson of this Office (202-366-5263).

Sincerely,



Jacqueline Glassman
Chief Counsel

Enclosure