

Mr. A. L. Bragg  
Laboratory Manager  
Truck-Lite Co., Inc.  
310 East Elmwood Ave.  
Falconer, NY 14733

Dear Mr. Bragg:

We have received your letter of February 22, 1993, to Paul Jackson Rice, the former Chief Counsel of this agency, with respect to his letter of December 30, 1992, to Stanley Electric Co. Ltd. In your opinion, the letter, which interpreted Safety Standard No. 108 as it applies to light-emitting diodes (LEDs), raises certain problems.

**You are correct that NHTSA equates individual LEDs with lighted sections.**

Currently, this is the only way in which NHTSA can relate LEDs to Standard No. 108, a standard based upon lamps with incandescent light sources. For this reason, NHTSA has begun to consider possible amendments to Standard No. 108 that would recognize, as the SAE has done with J1889, the advent of lamps with LED light sources. Should NHTSA then publish a notice of proposed rulemaking on this subject, we would welcome your further comments.

Sincerely,

John Womack Acting Chief Counsel

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