



NHTSA Interpretations 2009 - FMVSS 108 RELATED

Date	Docket#	
01/16/09	0022	An LED lamp with parking function may also be combined with a daytime running lamp (DRL) if it meets the photometric requirements of both functions. Previous interpretations indicated that FMVSS 108 S5.5.11(a) was written to exclude parking lamps <i>as</i> DRLs, but not exclude lamps that combine both parking and DRL dependent on the intensity of light emitted.
02/03/09	0023	Supplemental systems that retard the speed of a vehicle without applying the brakes do not need to illuminate the stop lamp when active, but it is not prohibited to do so either.
03/27/09	0070	An identification lamp cluster of three clearance lamps may not have additional lamps in between that illuminate into a single center high mounted stop lamp.
04/10/09	0072	Follow up and clarification to issues brought up in NHTSA-08-0040. Bicycles, passengers, nor other temporary loads constitute "motor vehicle equipment" that may "make inoperative" any of the required safety equipment. However, loaded bicycles on a bicycle rack that even partially interfere with a lamp's function would be deemed a violation of the make inoperative provision.
04/10/09	0078	A semitransparent metallic layer between a plastic lens and its protective coating must be included in the outdoor exposure test for plastic materials to determine if a lamp meets haze and weathering requirements. All portions of a lens, not just those that make up the EPLLA portion, are subject to the haze and weathering requirements.
07/30/09	0135	A multiplicity of warning lamps acting as auxiliary stop and turn signal lamps with lighted words describing the vehicle action ("STOP", "SLOWING DOWN", etc.) would not be permissible as it would impair the effectiveness of required lighting equipment and/or make inoperative safety equipment by diverting a driver's attention from the required signal lamps and causing confusion with respect to their meaning.
07/24/09	0138	It is not permissible to activate the stop lamps when a vehicle reaches a specified rate of deceleration regardless of whether the driver intended to activate a braking or engine retardation system.
09/14/09	0162	A replacement turn signal lamp that relies on wireless signals for actuation must comply with all FMVSS 108 requirements as well as potentially those from the FCC. Issues of compatibility with the vehicle's electrical system must also be addressed.

See following pages for additional NHTSA interpretations

NHTSA Interpretations 2009 - FMVSS 108 RELATED (Cont.)

Date	Docket#	
11/06/09	0176	Inner plastic lenses are required to meet haze and weathering test requirements. 'Protected' inner lenses are subject to less stringent test requirements - a 6 month weathering period instead of 3 years.

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