



22th November 2006

Policy Officer
European Commission
DG TREN E3
Office DM28 1/99
B-1049 Brussels

RE: Saving Lives with Daytime Running Lights

Dear Mr. Francesconi,

Thank you for your email dated 15th November 2006. On behalf of our members, we welcome the opportunity to respond to the *Consultation Paper – Saving Lives with Daytime Running Lights (DRL)*.

The ELC represents the leading lamp manufacturers in Europe and accounts for 95% of total European lamp production, with approximately 50,000 employees in Europe and a 5 billion EURO European turnover.

The ELC would like to support the Commission on their initiative to address road safety. Studies in several countries have shown clear evidence that driving with lights-on during the daytime, reduces the probability of accidents occurring, when various road users are involved.

The ELC Member Companies share the opinion that daytime running lights on all vehicles is the most efficient measure to increase safety under all conditions. We understand the vital element of a daytime running light system is the light source.

Today's technologies deliver optimised solutions with respect to power consumption and lifetime for driving with lights-on during the day. Our Member Companies are dedicated to deliver innovative products, which results in decreasing the power consumption of vehicle lights. In order to reduce the consumer costs (fuel consumption, bulb replacement) dedicated DRL without automatic switching is recommended. We also recommend dedicated DRL be installed on newly manufactured vehicles and ensure optimal retrofit options are available on after sales for existing cars.

We recommend that all road users should have the same level of attention in any future initiatives to ensure the maximum possible safety without affecting other participants. Further discussions maybe required if there is a need to distinguish motorcycles from other vehicles.

We appreciate all efforts to make daytime running lights mandatory on all vehicles. This will provide a significant contribution to realise the targets of the European Road Safety Charter.

I trust the information we have provided is clear. Please do not hesitate to contact me, should you have any further queries.

Yours sincerely,

A handwritten signature in black ink on a light-colored rectangular background. The signature is cursive and appears to read 'G Strickland'. A long horizontal line extends from the end of the signature to the right.

Gerald Strickland
Secretary General