

## Comment from Brian Birchler

Posted by the **National Highway Traffic Safety Administration** on Feb 13, 2024

Ford's petition should be granted. They properly reported the situation to the agency and then studied the lights under various conditions to check. Given that the lights which exceed the legal candela amount only go on when a vehicle is reversing, not when just driving, the issue would not affect safety during normal driving on the streets and freeways, where forward motion is the only motion. (and stopping) Ford's jury audit of the impact of the lights excessive candela amount during reversing showed that the jury could not even tell the difference between the legal candela lights and the excessive candela lights at short lengths of time and only could note the difference after looking at them for five minutes straight. However, that is unlikely to happen, as Ford pointed out, because when the brake lights were activated and then the legal candela and excessive candela lights were reilluminated, the jury again could not tell the difference. Since people depress the brake when putting their truck in reverse (as in a parking lot or boat ramp, etc) and intermittently while reversing, the same effect will happen in real reversing situations. Ford should be granted the decision of inconsequential noncompliance.