

## U.S.A Food and Drug Administration - Lightmare Comment

The Soft Lights Foundation has submitted a petition to the U.S. Food and Drug Administration requesting compliance with 21 U.S.C. 360jj and requesting that the FDA submit a report to the U.S. Congress on LED products. This petition is now open for public comment. Our goal is to convince the FDA to study the LED issue and submit a report to Congress as required under the law.

### [Comment from Roy Milnes Lightmare UK](#)

We campaign for road safety to reduce the danger from LED Headlamps, Daytime Running Lamps and Taillights.

#### **Lighting fundamentals:**

Headlamps have evolved from oil burning coach lamps and carbide acetylene lamps via perfectly functional seven inch parabolic reflector tungsten-halogen sealed beam units to glitzy designs using blinding eye damaging high intensity 6,500k Light Emitting Diodes (LED) and Laser Diodes.

Supposedly "Glare-free" intelligent light systems with image analysis have been developed (e.g. Matrix, IntelliLux, Adaptive High Beam Assist). Matrix LED systems use multiple LEDs that can be individually controlled to adapt the light pattern based on road conditions and oncoming traffic and can be adapted to change direction and brightness. However, to sense oncoming vehicles, the drivers are momentarily blinded and unless the road is billiard table smooth, they also blind drivers when functioning. Fortunately, the USA authorities have seen the dangers and not permitted automatic systems.

However the triumph of LED lights (and associated gimmicks such as laser projection) seems unstoppable.

The result: Glare for all road users, both motorised and non-motorised.

#### **The EU reported:**

*"Whilst vehicles are equipped with an increasing amount of safety devices e.g. ABS, ASC, SIPS, RFT, Radar, Lidar, absorbent bumpers, crumple zones etc. and roads are engineered with safety as a priority, the expected year on year downward trend of road accidents has halted"*

There is clear evidence in the UK and EU that these blinding lights are costing lives, since blinding lights (and touch screens) were introduced around 2010/2011. Last year 2025, we estimate this has cost 18,500 lives. The USA and Canada statistics are not directly comparable but there is evidence that accidents to vulnerable road users have increased.

The USA is in the forefront of consumer protection (e.g. VW/Corvair swing axle rear suspension to diesel emissions) we urge the FDA to take action against unapproved LED lights of all types in the interest of public safety.

#### **Attached:**

[LightSinn v10 by Roy Milnes and Prof Peter Heilig](#)

[Distraction Blindness by Prof Peter Heilig](#)

[Glare from Road Vehicle Lighting UK Transport Research Laboratory 2025](#)

[Regulations.gov](#) - Link to this comment