

Mr. Gary L. Johnson, Sr.
Trintex Corporation
P.O. Box 309
Bowdon, GA 30108-0309

Dear Mr. Johnson:

This is in reply to your letter of October 24, 2000, (apparently mailed later, as we did not receive it until January 8, 2001). You ask for a legal interpretation regarding your "Safety Light Cord," an example of which arrived shortly after your letter.

As you describe it, "the light cord attached to a battery activates four-way flashers" on trailers. When installed, "the cord will allow the emergency four-way flashers to blink to improve the visibility of disabled trailers." The cord apparently also can be used to provide power to trailer lighting systems in the event there is a disruption in the electrical connection between tractors and trailers.

Under our regulations, the Safety Light Cord is an item of "motor vehicle equipment," but there are no Federal motor vehicle safety standards that apply to it. This means that its manufacture and use are subject to any standards that may apply to it in any state in which it is sold or used, rather than it being subject to any Federal standards.

We are puzzled by your remark that the Cord activates "the emergency four-way flashers." On motor vehicles other than trailers and motorcycles, the front and rear turn signal lamps activated simultaneously by a vehicular hazard warning system operating unit comprise the hazard warning system required by Federal Motor Vehicle Safety Standard No. 108, "Lamps, Reflective Devices and Associated Equipment." However, Standard No. 108 does not require trailers to have either front turn signal lamps or a hazard warning system operating unit. We believe you mean to tell us that the Cord activates both rear turn signal lamps simultaneously in a flashing mode.

You also mentioned that "all the assembly parts . . . are already D.O.T. approved parts." We do not know what you mean by this statement. The Department of Transportation neither approves nor disapproves parts. Please understand that, even though we have informed you that none of our standards apply to the Safety Light Cord, Trintex may not represent that the Cord is "D.O.T. approved;" you must not use this expression in any manner in connection with this product.

If you have any further questions, you may call Taylor Vinson with whom you have talked previously (202-366-5263). We are returning the sample Cord under separate cover.

We appreciate your efforts to enhance the conspicuity of disabled trailers.

Sincerely,

John Womack
Acting Chief Counsel

ref:108

d.3/21/01